FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

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State Clearinghouse No. 2020100007

VOLUME I

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Metro

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Section 1.0 | Executive Summary

This Executive Summary is intended to provide the reader with a concise summary of the Los Angeles Aerial Rapid Transit Project (proposed Project) and its potential environmental effects. LA Aerial Rapid Transit Technologies LLC, as the Project Sponsor, is proposing the Los Angeles Aerial Rapid Transit Project. The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency for the proposed Project in accordance with the California Environmental Quality Act (CEQA).

The Project Sponsor is proposing the proposed Project, which would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. This Final Environmental Impact Report (Final EIR) has been prepared to satisfy the requirements of the California Environmental Quality Act (CEQA) statutes and guidelines, as amended (Public Resources Code, Section 21000-21178 and California Code of Regulations Title 14, Chapter 3 Section 15000–15387). This Final EIR is intended to assist Metro in making decisions regarding the adoption of the proposed Project. All references or citations in this Final EIR to the Draft Environmental Impact Report (Draft EIR) refer to the version of the Draft EIR as originally released for public review and comment on October 17, 2022, and not as modified by this Final EIR.

The proposed Project would connect LAUS to the Dodger Stadium property via an aerial gondola system. The proposed Project would also include an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The aerial gondola system would consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium, and would provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

1.1 PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

In accordance with CEQA Guidelines Sections 15088, 15089, and 15132, Metro, as Lead Agency, has prepared this Final EIR for the proposed Project proposed by the Project Sponsor. This section provides an overview of the purpose of this Final EIR for the proposed Project. This Final EIR has been prepared to comply with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000 et seq.).

This Final EIR is intended to assist Metro in making decisions regarding the adoption of the proposed Project. It is required by CEQA Guidelines section 15132 to include the Draft EIR or a revision of the draft;

comments and recommendations received on the Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Draft EIR; responses to comments received regarding the Draft EIR; and any other relevant information added by the lead agency.

Refinements to the proposed Project since circulation of the Draft EIR, as well as corrections and additions to the Draft EIR, are provided in Section 5.0, Corrections and Additions, of the Final EIR. The Final EIR also contains comments received on the Draft EIR and their responses, as well as updates and clarifications to the text and graphics.

As described in Section 3.0, Project Description, Section 5.0, Corrections and Additions, Section 6.0, Responses to Comments, of the Final EIR, the proposed Project's refinements and corrections and additions are the result of public comments and community outreach conducted as part of the Draft EIR circulation conducted pursuant to CEQA Guidelines Section 15105. Such modifications would not be considered "significant new information" pursuant to CEQA Guidelines Section 15088.5 as the modifications have been made to portions of the proposed Project alignment already described in the Draft EIR and have been made as a result of lengthy public outreach and discourse such that the public has not been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project or a feasible way to mitigate or avoid such an effect. As shown in Section 5.0, Corrections and Additions, of this Final EIR, the refinements to the proposed Project would not alter the conclusions of the Draft EIR regarding the potentially significant impacts of the proposed Project or result in any new or substantially more severe significant environmental impacts.

1.2 ENVIRONMENTAL REVIEW PROCESS AND COMMUNITY OUTREACH

Notice of Preparation and Scoping Meetings

In accordance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) was prepared and distributed to notify agencies, organizations, and individuals that Metro planned to prepare a Draft EIR, and to request input on the environmental analysis to be performed. The 45-day comment period began on October 1, 2020, and concluded on November 16, 2020 for a 46-day comment period. As part of the EIR scoping process, Project information was made available to the public online through two primary means: 1) a virtual "open house;" and 2) an online virtual scoping meeting. The virtual open house was accessible to reviewing parties and the public throughout the public review period. The virtual open house and online virtual scoping meeting were made accessible through Metro's project website at metro.net/aerialrapidtransit. The NOP and Project fact sheet were posted in the virtual open house, and the virtual scoping meeting was provided in English, Spanish, and Cantonese.

The online virtual scoping meeting was held on October 22, 2020, and included an overview of the proposed Project, an overview of the CEQA process, and the Project timeline for environmental review. The public was also able to submit questions and comments during the online meeting. A recording of the scoping meeting was posted on the Metro website following the meeting.

A total of 305 comments, composed of 8 agency comments, 20 organization comments, 226 individual comments, and 51 comments during the online virtual scoping meeting, were received in response to the NOP. In addition, an estimated 741 individuals visited the virtual open house and 75 individuals attended the online virtual scoping meeting. The NOP, and the public comments received during the 46-day review period for the NOP, are included in Appendix A of the Draft EIR.

The NOP included two potential alignment alternatives being considered for the proposed Project: the Spring Street Alternative and the Broadway Alternative. Due to feedback received during the scoping process, the Broadway Alternative is now being considered as the proposed Project. The Spring Street Alternative is discussed in Section 4.0, Alternatives, of the Draft EIR.

Draft EIR Public Review Period

Following the public scoping period and NOP release, Metro began developing the Draft EIR. Metro released the Draft EIR for the proposed Project on October 17, 2022, for a 60-day public review period ending on December 16, 2022. On November 15, 2022, Metro extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023. Notice of the release of the Draft EIR, the extension of the public review period, and the public meetings was provided to agencies and interested parties in several ways in compliance with CEQA, as discussed in detail in Appendix A, Public Outreach Report, of the Final EIR.

Metro held a total of eight public meetings immediately before, during, and after the 90-day Draft EIR public review period, including two community information sessions prior to the release of the Draft EIR. Following the release of the Draft EIR for public review, Metro held two informational workshops (one virtual and one in person), and four public hearings (two virtual and two in-person). All informational workshops and public hearings offered Spanish, Cantonese, and Mandarin interpretation, and, following a request for a Taishanese interpreter, the final two public hearings also offered Taishanese interpretation. Metro also provided materials in English, Spanish, Chinese (Traditional), and Chinese (Simplified), both as printed materials at the in-person public meetings, and electronically on Metro's project webpage and the SB 44 website.

An estimated 715[1] attendees participated in the eight public meetings. Metro received 1,132 comments during the Draft EIR public review period via U.S. mail, email, voicemail, and by submitting written and/or oral comments at the four public hearings.

Refer to Appendix A, Public Outreach Report, of this Final EIR, for detailed discussion of the Draft EIR public review period. Refer to Appendix B, Public Hearing Transcripts, and Appendix C, Public Comments on the Draft EIR, of this Final EIR, for copies of all public comments received on the Draft EIR during the public review period, and Section 6.0, Responses to Comments, for responses to comments received on the Draft EIR.

Prior to the release of the Final EIR, Metro hosted two pre-Final EIR release public meetings to provide an update on the proposed Project, with one held virtually via Zoom webinar, and one held in-person in the Project area. Project materials and information were provided at both the in-person meeting and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, Cantonese, and Taishanese. Upon the completion of the Final EIR and other required documentation, the Metro Board of Directors may adopt the findings relative to the proposed Project's environmental effects after implementation of mitigation measures, certify the Final EIR, and approve the proposed Project.

[1] The total number of attendees is based on the Zoom webinar attendees for virtual meetings and sign-in sheets for in-person meetings. Because attendees at in-person meetings were not required to sign in, the in-person estimates may not reflect the actual total number of attendees at the in-person meetings.

1.3 PROJECT OBJECTIVES

The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

The proposed Project objectives are as follows:

1. Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
2. Attract new transit riders to the Metro system through a unique experience of an aerial transit system connecting to Dodger Stadium.
3. Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
4. Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
5. Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
6. Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.
7. Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
8. Bring a world class aerial transit system to the Los Angeles area.
9. Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.
10. Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.
11. Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project.
12. Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.
13. Maximize the Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

1.4 PROJECT OVERVIEW

The proposed Los Angeles Aerial Rapid Transit Project (proposed Project) would connect Los Angeles Union Station (LAUS) to Dodger Stadium property via an aerial gondola system. The proposed Project would also include an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The aerial gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Established aerial gondola transit systems worldwide, such as in La Paz, Bolivia, and Mexico City, Mexico, are being used as rapid transit for the urban population that they serve. The proposed Project would employ a Tricable Detachable Gondola system (also known as "3S").[2] 3S Gondola system cabins carry approximately 30 to 40 passengers, more than monocable systems, allowing for higher capacity passenger transport. Similar to the systems used in Koblenz, Germany, Phu Quoc, Vietnam, and Toulouse, France, the proposed Project is expected to provide a smoother, more stable ride than would a monocable system.

1.5 PROJECT LOCATION

The proposed Project is located in the City of Los Angeles, situated northeast of downtown Los Angeles. Figure 1-1 shows the regional location of the proposed Project. The proposed Project would commence adjacent to LAUS and El Pueblo de Los Angeles (El Pueblo) and terminate at Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would include three stations, a non-passenger junction, and three cable-supporting towers at various locations along the alignment. As shown in Figure 1-2, the proposed Project location would generally be located within public right-of-way (ROW), or on publicly owned property, following Alameda Street and then continuing along Spring Street in a northeast direction through the community of Chinatown to the southernmost corner of the Los Angeles State Historic Park. The alignment would then continue northeast over the western edge of the Los Angeles State Historic Park and the Los Angeles County Metropolitan Transportation Authority (Metro) L Line (Gold) to the intersection of

[2] The naming convention for this system is derived from the German word "seil", which translates in English to "rope". Hence, Tricable Detachable Gondola systems are known as a "3S" systems due to the use of three ropes, or cables

North Broadway and Bishops Road. At this intersection, the proposed Project alignment would turn and continue northwest following Bishops Road toward its terminus at Dodger Stadium, located in the Elysian Park community. Figure 1-2 provides an overview of the proposed Project location, and Figure 1-3 provides an overview of the proposed Project alignment.

1.6 PROPOSED PROJECT ALIGNMENT AND COMPONENTS

The proposed Project "alignment" includes the suspended above-grade cables and cabins following the position of the Project components along the proposed alignment from Alameda Station to Dodger Stadium Station. The proposed Project alignment and locations, heights, widths, sizes, and design of the Project components are approximate and may change slightly during final design based on the discretionary entitlements, reviews, and approvals required for implementation of the proposed Project.

The proposed Project alignment would extend approximately 1.2 miles, beginning near El Pueblo and LAUS on Alameda Street. The proposed Alameda Station would be constructed over Alameda Street between Los Angeles Street and Cesar Chavez Avenue, adjacent to the Placita de Dolores and planned LAUS Forecourt. The location of the Alameda Station was selected because it maximizes the proposed alignment over public ROW and publicly owned property and minimizes aerial rights over private properties. The Alameda Station location was also selected because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access. The location is also compatible with Metro's plans at LAUS, including the planned LAUS Forecourt and Esplanade Improvements Project. Additional considerations include minimizing impacts to historic and archaeological resources.

From Alameda Station, the proposed Project alignment would remain primarily above the public ROW and publicly owned property with portions above private property, and travel north along Alameda Street to the proposed Alameda Tower, which would be constructed on the Alameda Triangle, a portion of City ROW between Alameda Street, North Main Street, and Alhambra Street.

From Alameda Tower, the proposed Project alignment would continue north along Alameda Street and cross Alpine Street. The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on City-owned property. In the process of selecting tower locations, the proposed Project prioritizes the use of public property and minimizes private land acquisition, and also considers the proposed Project's relationship to existing adjacent and potential future land uses. Technical considerations of tower locations also includes optimizing the height of the towers and minimizing the number of towers. Additionally, the proposed Project limits the bend on the towers to less than two degrees.

From Alpine Tower, the proposed Project alignment would follow the public ROW and continue over the elevated Metro L Line (Gold). North of College Street, Alameda Street becomes Spring Street, and the proposed alignment would generally follow Spring Street in a northeast trajectory until it reaches the southernmost point of Los Angeles State Historic Park, where the proposed Chinatown/State Park Station would be constructed partially on City ROW and partially within the boundaries of the Los Angeles State Historic Park. The Chinatown/State Park Station location minimizes the proposed Project's footprint within the Los Angeles State Historic Park.

The alignment then crosses over the western edge of the Los Angeles State Historic Park and the Metro L Line (Gold) tracks. The Chinatown/State Park Station location avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway.

The proposed Project alignment would continue traveling north towards the intersection of North Broadway and Bishops Road. Broadway Junction would be located at the northern corner of the intersection of North Broadway and Bishops Road (1201 North Broadway). From Broadway Junction, the proposed Project alignment would travel northwest primarily along Bishops Road, with portions above private property, crossing over SR-110 towards Dodger Stadium. The proposed Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate entrance road to Dodger Stadium and SR-110. The northern terminus of the system would be located in a parking lot at the Dodger Stadium property, where the proposed Dodger Stadium Station would be constructed.

Alameda Station

Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores between Los Angeles Street and Cesar E. Chavez Avenue. The station would be approximately 173 feet long, 109 feet wide, and 78 feet high at its tallest point, with the passenger loading platform approximately 31 feet above Alameda Street. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas to the station, would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as a parking and loading area for El Pueblo. On the east, vertical circulation elements would be introduced at-grade from the planned LAUS Forecourt. Installation of the vertical circulation elements may include removal of approximately 12 trees, removal of parking and loading for El Pueblo, and installation of landscaping and hardscape.

Alameda Tower

Alameda Tower would be located on the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue consisting of a small green space flanked on all sides by roadways. Alameda Tower would be 195 feet tall with the cable suspended 175 feet above-ground. The Alameda Tower would require the removal of approximately 10 trees and vegetation. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

Alpine Tower

Alpine Tower would be located on a City-owned parcel, currently being used as non-public parking storage for City vehicles, at the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). Alpine Tower would be 195 feet tall at its tallest point, with the cable suspended 175 feet above ground. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower.

Chinatown/State Park Station

Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. The southern portion of the station would be located on City ROW, while the northern portion of the station would be integrated into the southern boundary of the Los Angeles State Historic Park. The station would be approximately 200 feet long, 80 feet wide, and 98 feet tall at its tallest point, with the passenger boarding platform approximately 50 feet above-grade. Access to the boarding platform would be from the mezzanine via elevators and stairs. Comprised of three levels, elevators and stairs from the ground level would lead up to a mezzanine, 27 feet above-grade, and ramps for the queuing area would lead up to the boarding platform, which is 50 feet above-ground.

Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Chinatown/State Park Station would require the removal of approximately 30 trees and vegetation; however, it would include the installation of landscaping and hardscaping, including integration of the granite pavers. The aerial rights requirements for the proposed Project would require the additional removal of approximately 51 trees within the Los Angeles State Historic Park; however, the proposed Project would include the installation of replacement trees. Chinatown/State Park Station would provide passenger access to Chinatown, the Los Angeles State Historic Park, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex.

Broadway Junction

Broadway Junction is a non-passenger junction that would be located at the intersection of North Broadway and Bishops Road. The junction would primarily be located on privately-owned property with a portion of the junction and overhead cable infrastructure cantilevered and elevated above the public ROW. The existing commercial building located at 1201 N. Broadway would be demolished. Broadway Junction would be approximately 227 feet long, 60 feet wide, and 98 feet high at its tallest point, with the platform approximately 50 feet above the ground. Vertical circulation elements (i.e., elevators and stairs) would be installed on the northwest side of the junction for staff and maintenance access to the platform. Broadway Junction would require the removal of approximately 25 trees and vegetation.

Stadium Tower

Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate and SR-110 and would stand 179 feet tall with the cable suspended 159 feet above-ground. Stadium Tower would also include removal of approximately 10 trees and vegetation, however, it would include the installation of landscaping near the base of the tower. The surrounding fire buffer area around the Stadium Tower would include the removal of approximately 45 significant trees and vegetation.

Dodger Stadium Station

Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate. This station would be approximately 194 feet long, 80 feet wide, and 74 feet high at its tallest point. Cabins at this station would arrive and depart from an at-grade boarding platform, with the passenger queuing area also at-grade. Dodger Stadium Station would include a subterranean area below the platform for storage and maintenance of cabins, as well as staff break rooms, lockers, and parts storage areas. The cabins would be transferred between the station platform and the subterranean area by way of a cabin elevator. Automated parking and controls would manage the process of storing cabins or returning them to service. Cabins would be returned to and stored at Dodger Stadium Station when the system is not in use.

Restrooms for passenger use would be located at the station. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating.

Dodger Stadium Station would be located adjacent to Dodger Stadium in a portion of the existing parking lot. The proposed Project would provide a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Implementation of Dodger Stadium Station would require the removal of parking spaces, as well as removal of approximately 33 trees and vegetation, however, it would include the installation of replacement landscaping.

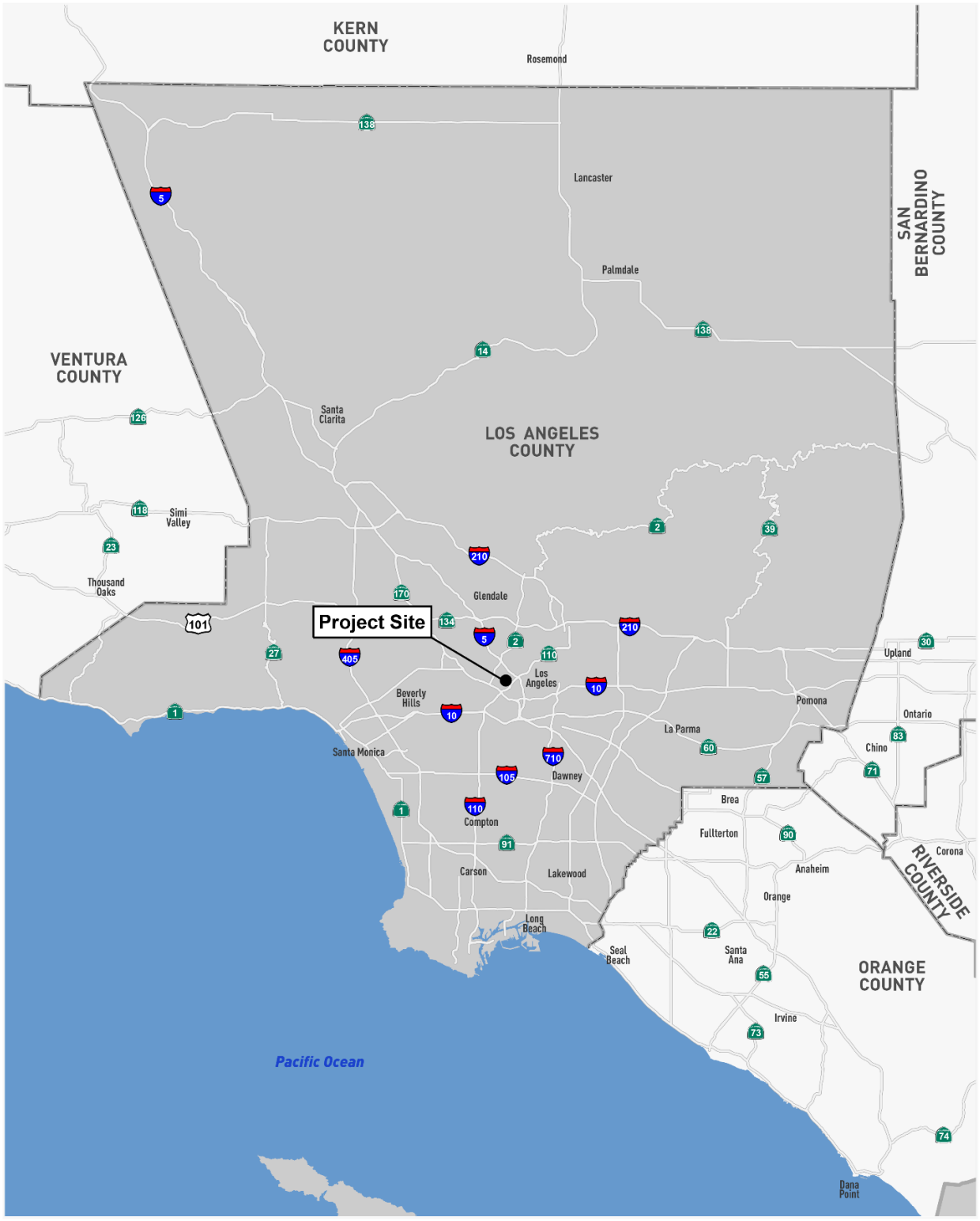

Figure 1-1: Regional Location Map

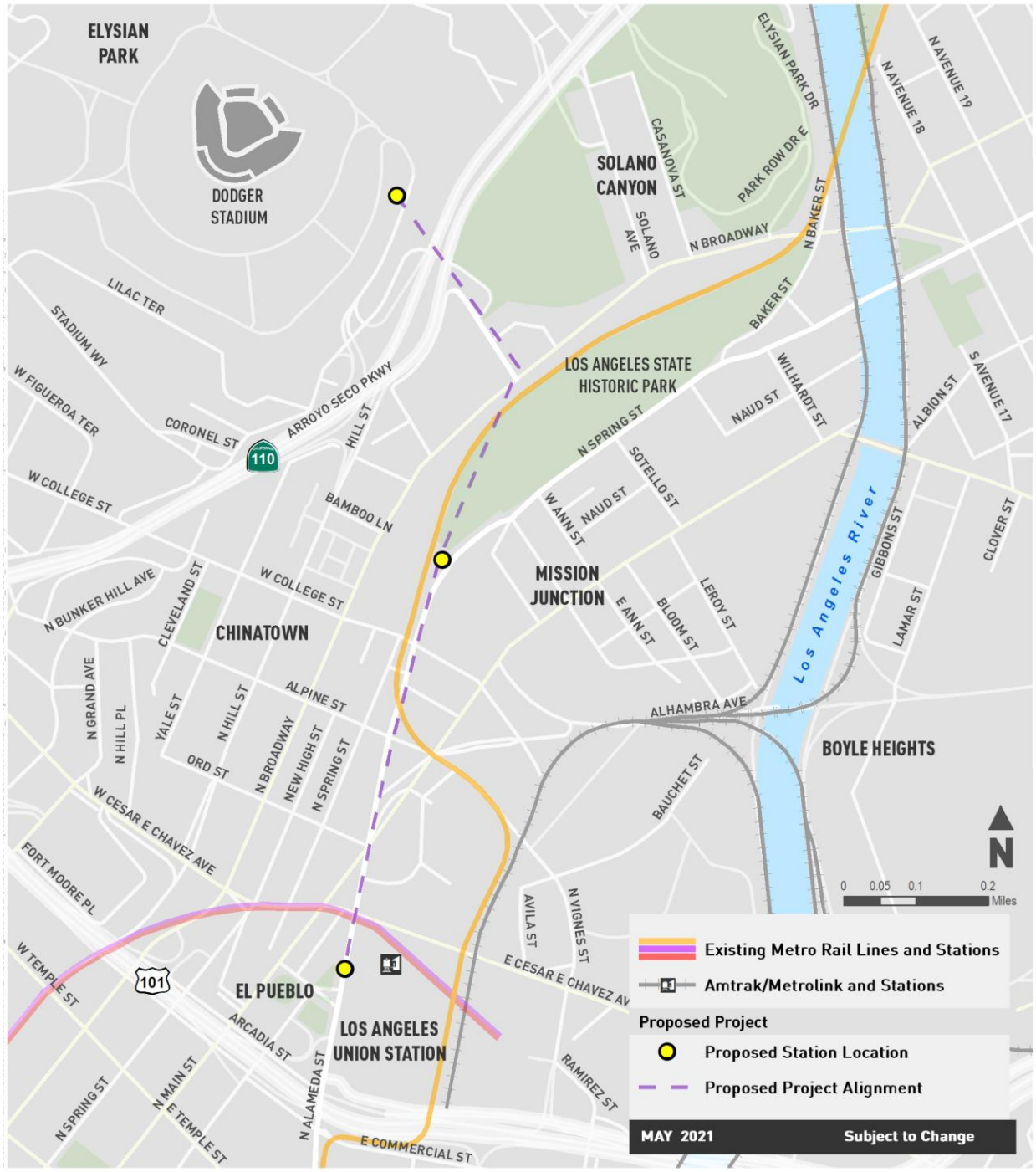

Figure 1-2: Proposed Project Location

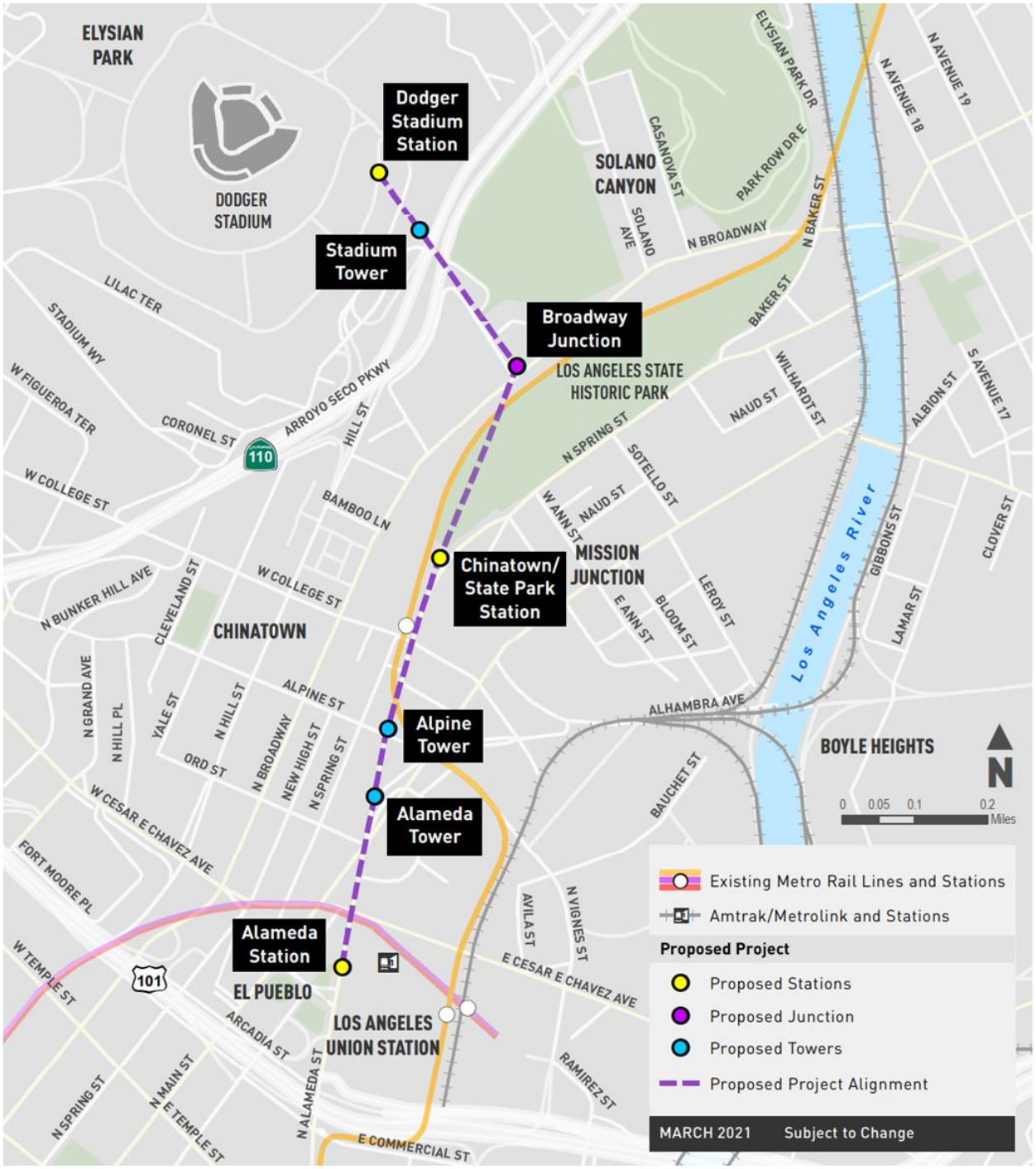

Figure 1-3: Proposed Project Alignment

1.7 SYSTEM OPERATIONS

Typical Operating Logistics

During operations, the cabins would travel on a continuous loop between Alameda Station and Dodger Stadium Station. Cabins would pass through passenger stations at roughly one foot per second (less than one mile per hour) to allow for unloading and loading. If needed, a cabin could be stopped to accommodate passenger boarding. After the cabins pass through the unload/load zones, the doors would close, and the cabins would accelerate to match the line speed of the haul rope before reattaching to the haul rope.

At Alameda Station, arriving cabins (southbound) would decelerate, doors would open, and passengers would unload. The cabins would execute a U-turn in the station before passing through the load zone (for northbound passengers), load passengers (if any), close doors, then accelerate to be reattached to the haul rope.

At Chinatown/State Park Station, cabins would detach from the rope and decelerate to the station speed. Since passenger access would be provided at this station, the cabins would decelerate to about one foot per second (less than one mile per hour) and the doors would open. After traveling through the unload and load zones, the cabin doors would close, and the cabins would accelerate to line speed and then reattach to the haul rope.

At Broadway Junction, where passenger unloading or loading is not proposed, the cabins would detach from the haul rope, decelerate to a speed of approximately six mph, execute a slight turn to follow the alignment, and then re-accelerate and reattach to the haul rope. Alameda Station to Broadway Junction and Broadway Junction to Dodger Stadium Station systems come together at Broadway Junction. When the cabins detach from the haul rope in the Junction, their move from one haul rope to the other haul rope would not be perceptible by passengers.

At Dodger Stadium Station, the cabins would decelerate, doors would open, and passengers would unload. Since Dodger Stadium Station would be an end station, the cabins would execute a U-turn in the station before passing through the load zone (for southbound passengers), load passengers (if any), close doors, then accelerate and reattach to the haul rope. As described above, gondola cabins would enter, traverse, and depart stations under fully automated control. Operation of the proposed Project would require approximately 20 personnel. Station attendants would be located within each station to assure safe boarding or to execute stops, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would sit in a control booth and monitor screens, which would show activities in each cabin and station, as well as the system controls.

Queueing and Ticketing/Fare Checking

Queueing areas would be built into and as necessary, adjacent to, each of the stations to provide a gathering place for passengers waiting to enter the stations, thereby preventing crowding of sidewalks and walkways by passengers around stations. Queueing for Alameda Station would occur in the planned LAUS Forecourt area on the east side of Alameda Street, and north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west side of Alameda Street. At Chinatown/State Park Station,

queueing would occur on the mezzanine and boarding platform levels. At Dodger Stadium Station, the queueing area would be located on the north side of the station in a designated queueing area adjacent to the station.

Ticketing for the proposed Project would use either a chip-based card system or electronic ticketing that could be purchased and saved on a personal mobile device. Using these types of technologies would allow for contactless fare checking at the stations. Riders would pre-purchase their ticket prior to entering the boarding platform and fares would be checked using a card reader/scanner.

Signage

Similar to other transit projects that incorporate signage, the proposed Project would include signage to support wayfinding for transit passengers including information about transit connections and other important information to facilitate transit usage. Private funding for the proposed Project is anticipated to be supported by naming rights and sponsorship revenues, and such sponsors would be recognized in Project signage, which would be designed consistent with applicable Metro, City, and State approval requirements. Such signage may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations. The digital signage would be limited to Alameda Station and Dodger Stadium Station. Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static, non-illuminated naming rights signage. In addition, directional and pedestrian signage would be placed adjacent to and throughout the proposed Project as necessary to facilitate access and safety, including along the pedestrian improvements between Metro's L Line (Gold) Station and the pedestrian connection between Dodger Stadium Station and Dodger Stadium. Project signage would be illuminated by means of low-level external lighting, internal lighting, or ambient light. Exterior lights would be directed onto signs to minimize off-site glare. Signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC), and in accordance with LAMC, lighting intensity will be minimized in order to avoid negative impacts to adjacent residential properties.

Lighting

Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, Chinatown/State Park Station mobility hub, and potential Dodger Stadium Station mobility hub would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction. Lighting for the pedestrian access enhancements, including the pedestrian improvements between Metro's L Line (Gold) Station and the pedestrian connection between Dodger Stadium Station and Dodger Stadium, would include new pole lights for security and wayfinding purposes, as well as low-level lighting to accent signage and landscaping.

Lighting would be low-level and primarily integrated within the architectural features. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses and would meet all applicable LAMC lighting standards.

Maintenance

The proposed Project would require routine maintenance that would be performed by the system operator. The overall system would be observed on a daily basis as part of the startup routine.

Routine maintenance activities would generally take place during overnight periods or other scheduled down time. Cabins and their associated grips and hangers would be maintained in the shop at Dodger Stadium Station. A work carrier cabin would be provided to facilitate work at tower equipment. Annual maintenance activities may require crane access at tower locations, including the potential to require the temporary closing of traffic lanes.

Rope maintenance schedules would be determined through a combination of system design and periodic monitoring. The haul rope would need replacement approximately every five to 10 years. This would require pulling a new haul rope, which would take up to two weeks to complete.

On a periodic basis, the system would undergo formal testing as prescribed by Cal/OSHA and appropriate ropeway standards. This formal testing is required by standards to occur at least every seven years. It is anticipated that the system would be closed to riders for up to two days during the formal testing events.

Backup power would be provided by battery storage located at each station and tower and the non-passenger junction. The battery storage system would be tested on a regular basis and would provide backup power to allow unloading of the system in the event of a power grid failure.

Safety Systems and Ancillary Elements

The proposed Project would be designed to minimize operational disruptions resulting from equipment issues, which are often predictable and avoidable. The proposed Project would focus on avoiding such issues through preventative maintenance and by including redundant equipment.

Operational disruptions resulting from equipment issues would be minimized through robust design and periodic and preventative maintenance. Robust design is an approach where, after the design requirements are engineered, extra design factors are incorporated into the system. Information from other modern urban aerial rapid transit systems, as well as the operating history of this system would be taken into account to schedule preventative and periodic maintenance. Combining experience from other systems with historical data from this system's operation would provide an evolving and robust maintenance program. The documentation would reflect daily, weekly, monthly and annual activities. Daily activities would largely focus on inspections to verify normal operation of components prior to public operations. Longer-term activities would generally focus on maintaining, replacing, or rebuilding components. Maintenance recommendations including inspection procedures and scheduled activities are required to be provided by the equipment provider. Compliance with those recommendations is required by Cal/OSHA, the authority responsible for regulating passenger ropeways in California.

To account for the possibility of potential mechanical issues that could potentially interrupt operations, the system would design and implement redundancies. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload

passengers from the system. Additional redundancies could include elements such as bullwheels, brakes, and conveyors.

Emergency Operations Plan

Safety and emergency procedures would be separated into two types: personal events and equipment events. The proposed Project would be designed to minimize service interruptions resulting from either type of event.

For personal events, such as a medical situation, operators would have the ability to contact local security, law enforcement or other emergency response agencies. In addition to attendants at each station, the system would include video surveillance and audio communications in each station and in each cabin. These features would allow for control room operators to see and communicate with passengers at any point in their trip.

In stations, surveillance would also serve to provide equipment monitoring. By observing operations from the control room, the equipment monitoring could allow for faster resolution of any system alarms or faults and may facilitate identification of unscheduled maintenance needs. Video surveillance at towers would be primarily for the purpose of equipment monitoring and diagnosis.

An Emergency Operations Plan would be prepared as part of the proposed Project and would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD). The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan will include communication protocols with local authorities for further instruction and coordination.

The plan would also address the unlikely scenario where the system cannot be moved to unload passengers normally at stations.

System components would be equipped with security features to ensure system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers will be secured at all times and only accessible by authorized personnel. The system components will be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin.

Power Requirements

Operational power requirements can be separated into two categories: normal operations and emergency operations. Power requirements for the proposed Project would be provided by the City of Los Angeles Department of Water and Power's (LADWP) Green Power Program, through a connection to their power grid, and would include the power to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). When operating at capacity, normal operations are estimated to require a total of approximately 2.5 megawatts of power.

Power requirements for emergency operations consist of the energy needed for operations in the event of a power grid failure. The proposed Project would include the installation of backup battery storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event

of a power grid failure. The total backup power required to allow unloading of the system is 1.4 megawatts.

Sustainability Features

The proposed Project would provide a sustainable, high-capacity zero emission ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. ART technology is quiet, and the proposed Project would reduce VMT and congestion, leading to reduced GHG emissions and improved air quality.

The proposed Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features, as feasible. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers.

The design intent and structural strategy for the stations and towers also provide an efficiency of materials. The steel plate tower forms have been designed as "Monocoque" structures, where structure, form, and finish are unified. Materials for the stations, junction, and towers would be locally sourced where possible, and would include recycled content where possible. Light-toned finish materials will also serve to minimize heat island concerns.

The proposed Project would be designed to comply with all applicable state and local codes, including the City of Los Angeles Green Building and Low-Impact Development (LID) Ordinances.

Construction

Construction of the proposed Project is anticipated to begin as early as 2024 and take approximately 25 months, including construction, cable installation, and system testing. The detailed construction procedures informing the environmental impact analyses are included in Appendix B, Construction Assumptions, of the Draft EIR. A summary of the construction activities is provided below. Construction of the Project components may partially overlap in schedule, especially since construction would occur at several physically separated sites.

Utility relocations would occur prior to construction of the proposed Project components and would be coordinated directly with the utility providers. Following utility relocations, construction would commence. Detailed information on utilities relocations is included in Appendix B, Construction Assumptions, of the Draft EIR.

During construction, some parking spaces at Dodger Stadium would be temporarily closed for construction of the Dodger Stadium Station and for overall Project construction, trailers, laydown and staging areas, and construction worker parking.

Construction of more than one Project component would occur at the same time, with consideration of available materials, work crew availability, and coordination of roadway closures. Table 1-1 below includes the estimated duration to complete construction of each of the proposed Project components, the maximum depths of drilled piles, the maximum depth of excavation, the amount of excavation, and the amount of materials (soils and demolition debris) to be exported for each component of the proposed Project.

Table 1-1: Proposed Project Construction Details

Component	Construction Duration	Maximum Construction Area	Maximum Depth of Drilled Piles	Maximum Depth of Excavation	Amount of Excavation	Amount of Materials Exported
Alameda Station	17 months	55,600 sq. ft.	125 feet	10 feet	2,728 cubic yards	2,295 cubic yards
Alameda Tower	12 months	40,600 sq. ft	120 feet	10 feet	2,850 cubic yards	2,292 cubic yards
Alpine Tower	11 months	38,700 sq. ft.	120 feet	10 feet	3,606 cubic yards	2,887 cubic yards
Chinatown/State Park Station	19 months	69,000 sq. ft.	80 feet	10 feet	6,267 cubic yards	4,567 cubic yards
Broadway Junction	19 months	65,000 sq. ft.	120 feet	7 feet	6,407 cubic yards	5,379 cubic yards
Stadium Tower	12 months	23,500 sq. ft.	120 feet	7 feet	1,286 cubic yards	1,202 cubic yards
Dodger Stadium Station	20 months	142,600 sq. ft.	55 feet	42 feet	44,313 cubic yards	44,001 cubic yards

Following completion of construction, the gondola cables would be installed, followed by system testing and inspections.

Working hours would vary to meet special circumstances and restrictions, but are anticipated to be consistent with the City's allowable construction hours of Monday through Friday between 7:00 a.m. to 9:00 p.m. and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m. While not anticipated, approval would be required from the City of Los Angeles Board of Police Commissioners for any extended construction hours and possible construction on Sundays.

Anticipated closures would include lane closures in which lanes would be closed 24-hours a day during certain phases of construction, or alternating closures during certain phases of construction, in which closures would occur during construction hours for approximately 10 hours a day, and roads would reopen during non-construction hours for approximately 14 hours a day. For alternating closures, during non-construction hours, steel plates would be placed over construction sites to the extent feasible in order to allow for vehicular and pedestrian circulation. The closures and hours would vary between location and phase of construction. The proposed Project would implement a Construction Traffic Management Plan that would include detours and ensure that emergency access is maintained throughout all construction activities.

1.8 REQUIRED PERMITS AND APPROVALS

The Project EIR will provide environmental clearance as needed for all of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project including, but not necessarily limited to, the following:

California Department of Transportation (Caltrans)

1. Pursuant to the California Streets and Highways Code section 660, approval from Caltrans through an encroachment permit and/or other agreement, form of permission, or approval(s) to access, construct, and/or operate the Project within/over the State transportation system right of way.

California State Parks

2. Approvals determined necessary by the California Department of Parks and Recreation for the Project could include, but not necessarily be limited to:
    a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.
    b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.
    c. Pursuant to Public Resources Code Section 5003 and Government Code Section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.
    d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

California Division of Occupational Safety and Health (Cal/OSHA)

3. Pursuant to Title 8, California Code of Regulations sections 3150 through 3191, approvals from the Amusement Ride & Tramway Division, including a Certificate of Construction.

Los Angeles County Metropolitan Transportation Agency (Metro)

4. Approvals determined necessary by Metro for the Project, could include, but not necessarily be limited to, the following:
    a. Pursuant to Public Utilities Code section 130252, submittal, review, and approval of proposed plans for design, construction, and implementation of the Project.
    b. Pursuant to Public Utilities Code section 130521 and Civil Code section 801, an easement or other agreement or approval to authorize the construction and operation of the Project within a portion of Los Angeles Union Station.
    c. Pursuant to Public Utilities Code section 130521, an encroachment permit or other agreement or approval to authorize construction and operation of the Project within any Metro L Line (Gold) right-of-way.

City of Los Angeles

5. Approvals determined necessary by the City for the Project, could include, but not necessarily be limited to, the following:
    a. Pursuant to Charter section 390 and Los Angeles Administrative Code section 13.4, to the extent applicable, to be processed by the Department of Public Works, Bureau of Engineering and the Department of Transportation, a franchise agreement to operate "upon, over, under, or along any street, highway or other place in the City of Los Angeles."
    b. Pursuant to Los Angeles Administrative Code section 22.109, to the extent applicable, approval of the design from the Cultural Affairs Commission for the Project components located within the public right-of-way.

c. Approvals, to the extent applicable, to be processed by the Department of City Planning, could include, but not necessarily be limited to, the following:

   i. Pursuant to LAMC section 11.5.7, the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures.

   ii. Pursuant to LAMC sections 13.11 and 12.32.S, a "SN" Sign District for a comprehensive set of sign regulations on the Project site to permit signage consistent with applicable City requirements.

   iii. Pursuant to LAMC section 12.24.M, a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow Stadium Tower and Dodger Stadium Station. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events."

   iv. Relief from the River Implementation Overlay District, to allow for Alameda Station, Alameda Tower, and Alpine Tower.

   v. Relief from the Cornfield Arroyo Seco Specific Plan to allow for Chinatown/State Park Station.

d. Pursuant to Government Code sections 65864 through 65869.5, a Development Agreement between the Project Sponsor and the City of Los Angeles for 20 years.

Other discretionary and ministerial permits, approvals, consultations, and coordination will or may be required, including, but not limited to, temporary street closure permits, demolition permits, grading permits, excavation permits, archaeological permits, encroachment permits, building permits, dewatering permits, stormwater permits, noise variances, work hour variances, haul routes, sign permits, any operational agreements, consultation with the State Historic Preservation Officer and other agencies, and any applicable permits or clearances related to water and/or energy infrastructure or emergency access.

1.9 PROJECT COST AND FUNDING

Section 4.0, Costs and Financing, of the Final EIR, provides detail as to the capital, operating, and maintenance costs and planned sources of funding for the proposed Project.

Capital cost estimates for the proposed Project are based on conceptual engineering drawings. Further technical refinements to the proposed Project and the potential selection of alternative designs during the approval process may impact capital costs. The capital costs are estimated at $385 - 500 million. Construction of the proposed Project assumes prevailing wages pursuant to a Project Labor Agreement.

Based upon the proposed service levels, the proposed Project operations and maintenance costs are projected at approximately $8 - 10 million per year (inclusive of capital reserve funds). Operation and maintenance costs are proposed to be fully funded out of Project revenues. Operations and maintenance costs assume prevailing wages. These costs are estimated in 2021 dollars.

The primary source of capital funding for the proposed Project would be bond financing serviced by revenue from the proposed Project. The revenue available for bond servicing is net of the costs of operation and maintenance costs represented in the above section. The primary sources of revenue for

the proposed Project are farebox revenues and naming rights sponsorship revenue, after which operating costs are deducted. The bond financing for the proposed Project assumes the independent credit rating of the proposed Project. The proposed Project is not seeking Metro funding. In addition, no other sources of public funding have been sought or committed to the proposed Project.

1.10 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, the proposed Project would result in significant and unavoidable impacts with regard to:

Noise and Vibration:

- **Construction Noise** – Project-level and cumulative noise impacts to noise-sensitive receptors from on-site construction activities.
- **Construction Vibration** – Project-level and cumulative human annoyance vibration impacts to adjacent sensitive receptors.

The proposed Project would not result in any significant and unavoidable operational impacts. Detailed analysis is provided in Section 3.0, Environmental Impact Analysis, of the Draft EIR.

1.11 ALTERNATIVES TO REDUCE SIGNIFICANT IMPACTS

CEQA Guidelines Section 15126.6(a) requires an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The CEQA Guidelines emphasize that the selection of project alternatives should be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly." The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed. Based on an analysis of these alternatives, an environmentally superior alternative is identified. Refer to Section 4.0, Alternatives, of the Draft EIR, for discussion of alternatives to the proposed Project.

No Project Alternative

In accordance with the CEQA Guidelines, the No Project Alternative assumes that no new development would occur within the Project site. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project Alternative assumes that the proposed Project would not occur within the Project site. This would result in no ART connections between the neighborhoods noted above. Additionally, VMT and vehicle congestion would not be reduced, and the associated reduction in GHG emissions and air quality improvements would not take place. The existing uses on the Project site would continue as under existing conditions.

Spring Street Alignment Alternative

Similar to the Project, the Spring Street Alignment Alternative would provide an ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and

the regional transit system accessible at LAUS. The Spring Street Alignment Alternative would include three stations, a non-passenger junction, and four cable-supporting towers at various locations along the alignment. The Spring Street Alignment Alternative would include the following components in common with the proposed Project: Alameda Station, Alameda Tower, Alpine Tower, Stadium Tower, and Dodger Stadium Station. In addition to these components, the Spring Street Alignment Alternative would also include the following components that would be unique to this alternative: Spring Street Junction, State Historic Park Station, and Bishops Tower.

The Spring Street Alignment Alternative would commence adjacent to LAUS and El Pueblo de Los Angeles (El Pueblo) and extend approximately 1.3 miles to its termination at Dodger Stadium. The Spring Street Alignment Alternative would begin near El Pueblo and LAUS on Alameda Street at the proposed Alameda Station, which would remain the same as the proposed Project. From the Alameda Station, the Spring Street Alignment Alternative would follow the same alignment as the proposed Project, remaining primarily above the public right-of-way (ROW). The Spring Street Alignment Alternative would continue north along Alameda Street and cross Alpine Street, where the proposed Alpine Tower would be constructed, and would follow the public ROW and continue over the elevated Metro L Line (Gold). The alignment would continue beyond College Street to the southernmost point of Los Angeles State Historic Park, where the proposed Spring Street Junction would be constructed. From the Spring Street Junction, the proposed alignment would continue to the proposed State Historic Park Station within the Los Angeles State Historic Park. At this location, the Spring Street Alignment Alternative would turn northwest over the Los Angeles State Historic Park and the Metro L Line (Gold) to Bishops Tower. From Bishops Tower, the Spring Street Alignment Alternative would cross over SR-110 to the proposed Stadium Tower. The northern terminus of the system would be the same as the proposed Project, being located in a parking lot at the Dodger Stadium property, where the proposed Dodger Stadium Station would be constructed.

Transportation Systems Management Alternative

The Transportation Systems Management (TSM) Alternative would enhance the existing Union Station Dodger Stadium Express (DSE) service to determine if the DSE could increase capacity. In order to meet service frequencies similar to the proposed Project, a minimum of 6 buses loading simultaneously would be required, which cannot be physically accommodated in the existing location for the Union Station DSE, and an off-site loading facility would need to be developed to accommodate the new level of bus activity. Furthermore, the existing DSE service operates up to 8 buses per hour, while the TSM Alternative would require 77 buses per hour.

In addition to a new off-site loading facility, operational changes would be required on surrounding streets to accommodate the increased congestion from the TSM Alternative. Additional loading facilities would also be required at Dodger Stadium, including dedicated bus only lanes, to accommodate the increased level of DSE service.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an

environmentally superior alternative is based on a comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project Alternatives are summarized in Table 4-3, Alternative Impact Comparison, which is located in Section 4.0, Alternatives, of the Draft EIR.

Of the alternatives analyzed in the Draft EIR, the No Project Alternative would be considered environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions. Although the No Project Alternative would not meet any of the Project Objectives, it would avoid all of the Project's significant impacts, including the Project's significant and unavoidable construction noise and vibration impacts. Conversely, the No Project Alternative would not result in ART connections between the neighborhoods noted above. Additionally, VMT and vehicle congestion would not be reduced, and the associated reduction in GHG emissions and air quality improvements would not take place.

However, the CEQA Guidelines require that the Draft EIR identify an environmentally superior alternative other than the No Project Alternative. Because the TSM Alternative would also avoid the Project's significant and unavoidable impact with respect to construction noise and vibration without the need for mitigation, and would reduce the range of impacts to the greatest extent listed in Table 4-3, it is deemed the Environmentally Superior Alternative. However, the TSM Alternative would not meet the majority of the Project's Objectives in full or in part. Conversely, the Spring Street Alignment Alternative would meet all of the Project Objectives.

1.12 DESIGN AND USE OPTIONS

Refer to Section 6.0, Design and Use Options, of the Draft EIR, for discussion of design and use options.

Design Option A

Design Option A would include a shift in the overall Project alignment between the Broadway Junction and Dodger Stadium Station to avoid aerial rights requirements over 451 E. Savoy Street. Under Design Option A, the Project alignment would shift to be further west from 451 E. Savoy Street, which would result in the alignment crossing over a small portion of Cathedral High School. This Design Option includes changes to the Project components of Broadway Junction, Stadium Tower, and Dodger Stadium Station. The Broadway Junction under Design Option A would have similar dimensions but would shift approximately 4 degrees to avoid aerial rights over 451 E. Savoy Street. The location of Stadium Tower would shift 115 feet to the west/northwest. Dodger Stadium Station would also shift further south to accommodate the shift in the Project alignment.

Design Option A would require six additional piles, as well as an additional 1,090 cubic yards (CY) of excavation and 463 additional CY of materials to be exported at Stadium Tower. Design Option A at Dodger Stadium Station would add eight piles, and an additional 27,492 CY of excavation and materials to be exported. The shift at Dodger Stadium Station would also result in the realignment of the Dodger Stadium perimeter roadway, which would require utility relocations. A total of six to eight weeks of additional time for utility relocation and an additional four weeks for construction of the Stadium Tower would be needed. Four additional weeks of construction activities for the Dodger Stadium Station would also be required to complete Design Option A.

Design Option B

In response to stakeholder feedback, who asked the Project Sponsor to assess the potential to reduce the number of towers along Alameda Street from two to one, Design Option B would include a 50-foot overall height increase at the Alameda Tower, and the removal of Alpine Tower. Design Option B would also require additional private aerial rights requirements due to the increased bend on the Alameda Tower that would result in gondola cables and cabins in closer proximity to private property. Design Option B would also require an additional 30 drilled piles and an increased pile cap thickness from five feet to eight feet, as well as an additional 1,260 CY of excavation and materials to be exported. A total of eight additional weeks of construction for the Alameda Tower would be required to complete Design Option B.

Design Option C

In response to stakeholder feedback, who asked the Project Sponsor to consider a taller Chinatown/State Park Station to increase the height of cabins entering and exiting the station along Spring Street, Design Option C would include a 35-foot overall height increase at the Chinatown/State Park Station. Design Option C would require drilled piles that are 100 feet deep, and an increase in pile cap thickness from six feet to eight feet. The maximum depth of excavation would increase by two feet and would result in an additional 717 CY increase in the amount of excavation and a 1,396 CY increase in the amount of materials to be exported. A total of eight additional weeks of construction for the Chinatown/State Park Station would be required to complete Design Option C.

Use Option D

In response to stakeholder feedback, Use Option D would substitute a non-passenger junction for the proposed Chinatown/State Park Station. As the station would be substituted for a junction, features that would be applicable to passengers would not be included in this Use Option, such as a passenger mezzanine and vertical circulation elements. This Design and Use Option would have the same location, height, width, length, and architectural finish as the proposed Project. No other project changes are proposed under this Use Option, and all other construction and operational features would be the same, or similar to, the proposed Project.

Design and Use Option E

Design and Use Option E would include an ADA-accessible pedestrian bridge that would gently slope from the central portion of the Los Angeles State Historic Park, over the Metro L Line (Gold), and up to North Broadway. The entrance to the pedestrian bridge would be located on the south side of Broadway, east of the intersection of North Broadway and Bishops Road, and would provide pedestrian access to neighborhoods and land uses north of Broadway. The Los Angeles State Historic Park General Plan and Final EIR[3], developed by the State Park and Recreation Commission, analyzed a potential bridge at this location. The potential bridge could provide much-needed access to the Park for neighborhoods at the Park's northern boundary. Subsequent to the Los Angeles State Historic Park General Plan and Final EIR, the Department of Parks and Recreation conducted the "Bike and Pedestrian Bridge Study," a feasibility study of various bridge design alternatives and locations to explore and evaluate the feasibility of providing safe pedestrian and bike access from the Chinatown and Solano Canyon Communities into the

[3] California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

Los Angeles State Historic Park ("Bridge Feasibility Study").[4] The Bridge Feasibility Study, released on January 15, 2020, sought to articulate the issues and benefits of each location to identify preferred bridge design concepts.

Design and Use Option E would require a total of 40 drill piles, which would result in approximately 700 CY of excavation and 400 CY of material to be exported. A total of approximately 60 weeks of construction would be required to complete Design and Use Option E, which could occur concurrently with construction of the proposed Project.

1.13 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 1-2 provides a summary of the environmental impacts of the proposed Project. The proposed Project would result in significant and unavoidable impacts related to Noise and Vibration.

Project Design Features (PDFs), while not necessary for the impact significance determination, are included in Table 1-2 because they are inherent in the design of the proposed Project. Best Management Practices, or other measures required by law and/or permit approvals, are also requirements of the proposed Project. Additionally, Mitigation Measures have been identified and are additional actions designed to avoid, minimize, or compensate for significant environmental impacts and are required where significant impacts have been identified. Where applicable, Mitigation Measures are described in Table 1-2.

Table 1-2 identifies any revisions made to PDFs and Mitigation Measures to provide more detail or clarity to the Draft EIR. These revisions were either initiated by the lead agency or made to address comments received during the public review period. New content is shown in underline and removed content is shown in ~~strikethrough~~. None of these corrections or additions constitute significant new information that would necessitate a recirculation of the Draft EIR.

[4] California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

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Table 1-2: Summary of Environmental Impacts

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
AESTHETICS			
AES-1: *Would the Project have a substantial adverse effect on a scenic vista?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
AES-2: *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*	**Construction:** No Impact. **Operations:** No Impact.	No mitigation measures required.	**Construction:** No Impact. **Operations:** No Impact.
AES-3: *In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
AES-4: *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required. **AES-PDF-A: Project Lighting.** The Project would also include the following Project Design Features related to lighting: • Building Lighting will not exceed 60 watts. • Building Lighting outdoor luminaires will not exceed 6200 initial lumens. • Sign Lighting luminance will not exceed 10,000 candelas per m2 (cd/m2) during the	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		day from after sunrise until 45 minutes prior to sunset. Sign Lighting will not exceed 300 cd/m2 at night from sunset until 45 minutes prior to sunrise. • Sign Lighting luminance shall transition smoothly from daytime luminance to nighttime luminance and vice versa. • Illuminated signs that have the potential to exceed 300 cd/m2 will include an electronic control mechanism to reduce sign luminance to 300 cd/m2 at any time when ambient sunlight is less than 100 footcandles (fc).	
AGRICULTURE AND FORESTRY RESOURCES			
AFR-1: *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*	No Impact.	No mitigation measures required.	No Impact.
AFR-2: *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*	Less Than Significant Impact.	No mitigation measures required.	Less Than Significant Impact.
AFR-3: *Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4256), or timberland zoned Timberland Production*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
(as defined by Government Code section 51104(g))?			
AFR-4: *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*	No Impact.	No mitigation measures required.	No Impact.
AFR-5: *Would the Project involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*	No Impact.	No mitigation measures required.	No Impact.
AIR QUALITY			
AIR-1: *Would the project conflict with or obstruct implementation of the applicable air quality plan?*	Less Than Significant Impact.	No mitigation measures required. **AIR-PDF-A:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA.	Less Than Significant Impact.
AIR-2: *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*	Less Than Significant Impact.	No mitigation measures required. Refer to **AIR-PDF-A** as defined in **AIR-1**.	Less Than Significant Impact.
AIR-3: *Would the project expose sensitive receptors to substantial pollutant concentrations?*	Less Than Significant Impact.	No mitigation measures required. Refer to **AIR-PDF-A** as defined in **AIR-1**.	Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
AIR-4: *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*	Less Than Significant Impact.	No mitigation measures required. Refer to **AIR-PDF-A** as defined in **AIR-1**.	Less Than Significant Impact.
BIOLOGICAL RESOURCES			
BIO-1: *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	**MM-BIO-A:** *Avoid and minimize project related impacts to special-status and/or roosting bat species*. During the maternity season (April 15 through August 31) prior to construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower), because these locations provide potentially suitable habitat. A visual inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed using acoustic recognition technology to determine if any maternity roosts are present. To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented: <u>At the SR-110 Overpass</u> Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		vibration) could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity-roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist. To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented: <u>Trees</u> All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree removal. Palm trees are	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		present at the Alameda Station site along Alameda Street and eucalyptus trees are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist. • If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season when the young are self-sufficient. If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have significantly lowered their physiological state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active. • Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days. ○ Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately or, after emergence, will avoid returning to the roost. ○ Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2. • Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal. • The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities. **MM-BIO-B:** *Avoid and minimize project related impacts to nesting birds.* To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction activities that may occur during the nesting season, the following mitigation measure shall be implemented: • Construction activities, including the clearance of trees potentially suitable for	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed: o A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded. o A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300 to 500 foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis taking	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager, and all Project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site. ○ Buffers will be delineated on-site with bright flagging, for easy identification by project staff. The on-site construction supervisor and operator staff will be notified of the nest and the buffer limits and instructed of the sensitivity of the area to ensure the buffer is maintained. ○ A summary of preconstruction surveys and methodologies employed,	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season. **BIO-PDF-D.** The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides. **BIO-PDF-G.** Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).	
BIO-2: *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*	No Impact.	No mitigation measures required.	No Impact.
BIO-3: *Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling,*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
hydrological interruption, or other means?			
BIO-4: *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-BIO-A** and **MM-BIO-B** as defined in **BIO-1.** **BIO-PDF-B. Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.** The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components: • (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities. • (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species. • (3) Annual reporting criteria and requirements. **BIO-PDF-C. Cabin Window Features.** The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. **BIO-PDF-H.** Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.	

BIO-5: *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*	**Construction:** Less Than Significant Impact. **Operations:** No Impact.	No mitigation measures required. **BIO-PDF-A.** The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage. **BIO-PDF-E. Tree Disease Management.** Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.),* and goldspotted oak borer (*Agrilus*	**Construction:** Less Than Significant Impact. **Operations:** No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		auroguttatus) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management. **BIO-PDF-F.** The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees: • City of Los Angeles: o "Protected" Trees: 4:1 o Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1 o "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1) • California Department of Parks and Recreation: At least 1:1 • Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1	
BIO-6: *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
Conservation Plan, or other approved local, regional, or state habitat conservation plan?			
CULTURAL RESOURCES			
CUL-1: *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-VIB-A** and **MM-VIB-B** as defined in **NV-2.** *The Winery* **CUL-PDF-A. Pre-Construction Documentation of The Winery.** Prior to the~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The full northern elevation (facing Cesar E. Chavez Avenue) and	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		i. The roofline, foundation, and any door, window, or walkway openings, ii. Detail views showing the typical existing condition of the exterior wall, and iii. Detail views showing any existing damage to the exterior such as cracks or spalling. b. West elevation (facing Olvera Street), and i. The roofline, foundation, and any door, window, or walkway openings, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. c. East elevation (facing Alameda Street) i. The roofline and foundation, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. 3. Include written descriptive data, including detailed notes of its pre-construction	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to only be distributed to repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		CUL-PDF-B. Post-Construction Documentation of The Winery. Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68). *El Grito (The Cry) Mural Project Design Features* **CUL-PDF-C. Pre-Construction Documentation.** Prior to the ~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the *El Grito* mural, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history,	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The entirety of the *El Grito* mural from edge to edge, looking straight on b. The left half of the *El Grito* mural looking straight on c. The right half of the *El Grito* mural looking straight on d. Oblique views illustrating the curvature of the wall e. Sequential photographs showing the various panels and subjects in greater detail f. The back and sides of the curved wall on which the *El Grito* mural is located, and g. Detail views showing: i. Typical profile view of the *El Grito* mural (e.g., showing the depth of the tiles on the substrate) ii. Notch shapes at the top two corners (two views, left and right) iii. Curved shape of the sides of the *El Grito* mural (two views, left and right side)	

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		iv. Typical grout between tiles in two or more locations v. Bottom edge where the *El Grito* mural meets the plaza floor vi. Any existing damage or deterioration prior to construction 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to be distributed to only repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository preference) of the	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		descriptive data, index to photographs, photo key plan, and photographs. c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. **CUL-PDF-D. Protection During Adjacent Construction.** Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will ensure that the *El Grito* mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for	

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		protecting historical resources during nearby construction, the following measures, at a minimum, should be implemented: 1. Vibration monitoring equipment (VIB-A) should be carefully installed so that it does not permanently damage the face of the *El Grito* mural. 2. The *El Grito* mural should be cushioned and buttressed from either side of the wall with padded wood supports. The padding may consist of insulating foam or similar material. 3. A protective barrier or barriers made from plywood should be installed over the front, back, top, and sides of the *El Grito* mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable panels or a similar feature to ensure the vibration monitors and mural can be visually inspected during construction monitoring (CUL-PDF-C). 4. Plastic tarp or polyethylene sheeting should be secured over the wood barriers to protect against the accumulation of dust or contact with materials such as uncured concrete or other liquids that could damage or mark the surface of the *El Grito* mural. All of the protective measures described above should be installed and secured in such a way that does not damage the	

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		El Grito mural or the wall on which it is located. The barrier will not be physically attached to the *El Grito* mural or wall with screws, nails, or other fasteners. **CUL-PDF-E. Construction Monitoring Plan (Built Resources).** Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the DCA. The Construction Monitoring Plan will identify specific project milestones at which a qualified professional meeting the Secretary of the Interior's Standards for architectural history or historic architecture will be notified by the Project Sponsor or Project Sponsor's contractor to visit the site and observe and document the *El Grito* mural's condition. Details will be recorded in construction monitoring memorandums submitted to DCA. These milestones will include, at a minimum: 1. Pre-Construction: Before protection measures are installed (CUL-PDF-D), to confirm the baseline condition of the *El Grito* mural is still consistent with the information presented in the HABS-like documentation (CUL-PDF-C). 2. Pre-Construction: Once protection measures (CUL-PDF-D) are installed, to ensure they are sufficient, and their installation has not damaged the *El Grito* mural.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		3. Construction: After each phase of active construction 4. Post-Construction: After construction is complete and protective measures have been removed. At this stage, pictures of the *El Grito* mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the *El Grito* mural before and after construction. The Construction Monitor will also be included on notifications from the real-time vibration monitoring equipment (VIB-A). In the event that damage to the *El Grito* mural not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the Project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68.	
CUL-2: *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*	**Construction:** Significant Impact. **Operations:** No Impact.	**MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan.** A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific Project components, such as the Chinatown/State Park	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda ~~s~~Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." Specifically, the CRMMP shall be applicable to all ground disturbance activities extending into native soil within known archaeological sites and other areas of high sensitivity. Excavations within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required	

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		to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at the Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground disturbing activities in native soil within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA.	

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		Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, t~~T~~reatment may include implementation of archaeological data recovery excavations to remove the resource ~~or preservation in place~~. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting. If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC. For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal. **MM-CUL-B: Archaeological Resources Worker Training Program.** To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and Los Angeles State Historic Park staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by Los Angeles State Historic Park and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP. **MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station).** To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will, therefore, also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed. If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described. **MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt.** To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant sample of	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described. **MM-CUL-E: Archaeological Testing Plan for Los Angeles State Historic Park.** To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the Area of Direct Impacts for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		sizes, and the criteria thresholds that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described. **MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station.** After implementation of CUL-E, if it is found that the Los Angeles State Historic Park amenities (e.g., concessions and restroom) at the Los Angeles State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the Los Angeles State Historic Park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
CUL-3: *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*	**Construction:** Significant Impact. **Operations:** No Impact.	Refer to **MM-CUL-D ~~and MM-CUL-F~~** as defined in **CUL-2**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.
ENERGY			
ENE-1: *Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*	<u>Electricity</u> **Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact. <u>Fuel</u> **Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact. <u>Natural Gas</u> **Construction:** Less Than Significant Impact. **Operations:** No Impact.	No mitigation measures required.	<u>Electricity</u> **Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact. <u>Fuel</u> **Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact. <u>Natural Gas</u> **Construction:** Less Than Significant Impact. **Operations:** No Impact.
ENE-2: *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*	Less Than Significant Impact.	No mitigation measures required.	Less Than Significant Impact.
GEOLOGY AND SOILS			
GEO-1: *Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: rupture of a*	**Construction:** Significant Impact.	**MM-GEO-A**: **Prepare a Site-Specific Final Geotechnical Report.** The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site-specific	**Construction:** Less Than Significant Impact with Mitigation.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?	**Operations:** Less Than Significant Impact.	final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). A site-specific geotechnical exploration program, along with associated laboratory testing, is necessary to complete a design-level evaluation of the geologic hazards and conditions, seismic hazards, grading conditions, and foundation capacities. The site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings, conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design. Additionally, the geotechnical report shall include recommended measures to reduce potential impacts related to landslides, subsidence, liquefaction, differential settlement, expansive soils, soil corrosivity, or other potential ground failures induced by the proposed Project. The submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety. The Project Sponsor shall implement the recommendations contained in the approved report during project design and construction.	**Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
GEO-2: *Would the Project result in substantial soil erosion or the loss of topsoil?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
GEO-3: *Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-GEO-A** as defined in **GEO-1**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
GEO-4: *Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the current CBC, creating substantial direct or indirect risks to life or property?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-GEO-A** as defined in **GEO-1**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
GEO-5: *Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*	**Construction:** No Impact. **Operations:** No Impact.	No mitigation measures required.	**Construction:** No Impact. **Operations:** No Impact.
GEO-6: *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*	**Construction:** Significant Impact. **Operations:** No Impact.	**MM-GEO-B: Prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP***).* A PRMMP shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring. The qualified paleontologist shall supervise the paleontological monitor, who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist, and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials. If any paleontological materials are found, the paleontological monitor shall temporarily divert or redirect ground-disturbing activities in the area of the exposed fossil to facilitate evaluation, and if necessary, salvage. The paleontologist shall assess the discovered material(s) and provide a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Project Sponsor shall comply with the recommendations of the evaluating paleontologist, and ground-	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		disturbing activities may resume once the paleontologist's recommendations have been implemented to the paleontologist's satisfaction. If paleontological materials are found, the paleontologist shall prepare a report identifying the resource and the recommendations proposed and implemented, within 1 year of completion of the fieldwork. A copy of the report shall be submitted to the Los Angeles County Natural History Museum.	
GREENHOUSE GAS EMISSIONS			
GHG-1: *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required. **GHG-PDF-A: Green Power**. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
GHG-2: *Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*	Less Than Significant Impact.	No mitigation measures required.	Less Than Significant Impact.
HAZARDS AND HAZARDOUS MATERIALS			
HAZ-1: *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*	**Construction:** Significant Impact.	**MM-HAZ-A:** *Prepare a Soil and Groundwater Management Plan*. The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning,	**Construction:** Less Than Significant Impact with Mitigation.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
	Operations: Less Than Significant Impact.	or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment. <u>This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and</u>	**Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. **MM-HAZ-B:** *Hazardous Materials Abatement.* Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 Code of Federal Regulations 1926.62 regarding lead in construction, and OSHA 29 Code of Federal Regulations 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including	

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		wetting the area to prevent possible release of hazardous materials into the air and removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.	
HAZ-2: *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-HAZ-A** and **MM-HAZ-B** as defined in **HAZ-1**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
HAZ-3: *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-HAZ-A** and **MM-HAZ-B** as defined in **HAZ-1**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
HAZ-4: *Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*	**Construction:** Significant Impact. **Operations:** No Impact.	Refer to **MM-HAZ-A** and **MM-HAZ-B** as defined in **HAZ-1**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.
HAZ-5: *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
HAZ-6: *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
HYDROLOGY AND WATER QUALITY			
HWQ-1: *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
HWQ-2: *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*	**Construction:** Less Than Significant Impact. **Operations:** No Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** No Impact.
HWQ-3: *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:* *i. result in substantial erosion or siltation on- or off-site;* *ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;* *iii. create or contribute to runoff water which would exceed the capacity of*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or *iv. impede or redirect flood flows?*			
HWQ-4: *Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*	Less Than Significant Impact.	No mitigation measures required.	Less Than Significant Impact.
HWQ-5: *Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
LAND USE AND PLANNING			
LUP-1: *Would the Project physically divide an established community?*	**Construction:** Less Than Significant Impact. **Operations:** No Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** No Impact.
LUP-2: *Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*	Significant Impact.	**MM-LUP-A: Obtain a Los Angeles State Historic Park General Plan Amendment.** Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.	Less Than Significant Impact with Mitigation.
MINERAL RESOURCES			
MIN-1: *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
MIN-2: *Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*	No Impact.	No mitigation measures required.	No Impact.
NOISE			
NV-1: *Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards or other agencies?*	**Construction**: Significant and Unavoidable. **Operation**: Less Than Significant Impact.	**MM-NOI-A:** *Prepare a Construction Noise Management Plan.* Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The Construction Noise Management Plan shall include the following measures to reduce noise levels: • **Noise Barriers:** Temporary construction noise barriers between the Project construction area and affected receptors shall be installed as identified below. The noise barriers shall be designed to have a sound transmission class (STC) rating of at least 25 and should have the ability to provide a range of noise reduction between 5 dBA and 15 dBA when the construction equipment is located below the elevation level of the noise barrier and there is no line-of-sight between the construction equipment and the noise-sensitive receptors. Specific locations and heights for the temporary noise barriers shall include the following by Project components: • Alameda Station	**Construction**: Significant and Unavoidable. **Operation**: Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		○ For the entire duration of construction, the Project shall provide a 24-foot tall temporary noise barrier between the Project construction site and NSR 3 [Mozaic Apartments]. ○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 1A [Union Station] and NSR 1B [First Five LA]. ○ During the Foundations and Columns phase, the Project shall provide a 10-foot temporary noise barrier between the Project construction activities occurring within Alameda Street and NSR 1A [Union Station], NSR 1B [First Five LA], NSR 2 [El Pueblo], and NSR 3 [Mozaic Apartments]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 3. – Alameda Tower o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 4 [The California Endowment]. o During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 4. – Alpine Tower o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 6 [Chinatown Senior Lofts] and NSR 7 [Homeboy Industries].	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 6 and NSR 7. ○ NSR 5 [Future Residential] is currently an undeveloped City-owned parking lot and is proposed for future multi-family residential uses. If NSR 5 is occupied by residential units at the time of Project construction, the following noise barriers shall be provided: ▪ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 5. ▪ During the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases, the Project shall provide a 24-foot temporary noise barrier	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		between the Project construction site and occupied residential units at NSR 5 [Future Residential]. ▪ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 5. – Chinatown/State Park Station o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 9 [Blossom Plaza], NSR 10 [Future Residential Development], NSR 11 [Capitol Milling], and NSR 14S [Los Angeles State Park]. The noise barrier will include a gate that may be temporarily opened for access during construction hours along	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		Spring Street for construction access. o For the entire duration of construction, the Project shall provide a 10-foot temporary noise barrier between the Chinatown/State Park Station and NSR 8 [College Station] and NSR 12 [Future Residential Development]. o During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 8, NSR 12, and NSR 14S. – Broadway Junction o For the entire duration of construction, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 13 [Future Development], NSR 14N [Los Angeles State Historic Park], and NSR 17 [Low Rise Residential].	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		○ During the Demolition phase and the Foundations and Columns phase, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School]. ○ During the Structural Steel and Gondola Equipment Erection phase and the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] ○ During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 13, NSR 14 N, NSR 16, and NSR 17.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		– Stadium Tower o During the Foundations and Columns phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] and NSR 17 [Low Rise Residential]. o During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between Project construction and NSR 16 and NSR 17. • **Equipment Maintenance:** Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts and shall be fitted with the best available noise suppression devices (i.e., mufflers, lagging, and/or motor enclosures). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		• **Electrical Sources:** When possible, on-site electrical sources shall be used to power equipment rather than diesel generators. • **Sensitive Uses:** Fixed and/or stationary equipment (e.g., generators, compressors, concrete mixers) shall be located away from noise-sensitive receptors. • **Community Outreach:** The following shall be implemented to reduce impacts to the local community related to disturbances from construction noise: – Noise Disturbance Coordinator: A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		actions shall be implemented and a report of the action provided to the reporting party. – Construction Notice: The construction contractor shall provide a construction notice to residents within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used and duration of construction activities, permit number, name and phone number of the job superintendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator. • **Limit Idling Equipment**: Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations. **NOI-PDF-A: Gondola Cabin Noise Control Features.** The Project's gondola cabins shall include the following features: 1. Gondola cabins shall be designed with an interior-to-exterior noise reduction rating of no less than Sound Transmission Class (STC) 35.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		2. If heating, ventilation, and air conditioning (HVAC) units are included in the gondola cabin design, they shall be designed with a sound power level of no more than 71 dBA.	
NV-2: *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*	**Construction**: Significant and Unavoidable. **Operation**: Less Than Significant Impact.	**MM-VIB-A: Vibration Monitoring.** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for: • Vibration Monitoring Equipment: the placement of vibration monitoring equipment ~~at least~~ approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices. • Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded. **MM-VIB-B: Force-Adjustable Ground Compaction Devices.** For construction work occurring at the Alameda Station in proximity to	**Construction**: Significant and Unavoidable. **Operation**: Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery: • At a distance of 26 feet or more from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities. • Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), *El Grito* Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. Refer to **CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D**, and **CUL-PDF-E** as defined in **CUL-1**	
NV-3: *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or*	No Impact.	No mitigation measures required.	No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
working in the project area to excessive noise levels?			
POPULATION AND HOUSING			
POP-1: *Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
POP-2: *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.
PUBLIC SERVICES			
PS-1: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: Fire Protection?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **WFR-PDF-A** as defined in **WFR-1.** Refer to **MM-TRA-B** as defined in **TRA-3.**	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
PS-2: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental*	**Construction:** Significant Impact **Operations:** Less Than Significant Impact.	Refer to **MM-TRA-B** as defined in **TRA-3.**	**Construction:** Less Than Significant Impact with Mitigation.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: Police Protection?			**Operations:** Less Than Significant Impact.
PS-3: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Schools?*	**Construction:** Significant Impact **Operations:** Less Than Significant Impact.	Refer to **MM-TRA-B** as described in **TRA-3.**	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
PS-4: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services? Other public facilities?*	**Construction:** Significant Impact **Operations:** Less Than Significant Impact.	Refer to **MM-TRA-B** as described in **TRA-3.**	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.
PARKS AND RECREATIONAL FACILITIES			
PR-1: *Would the Project result in an increase in the use of existing neighborhood and regional parks or*	**Construction**: Less Than Significant Impact.	No mitigation measures required.	**Construction**: Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	**Operation**: Less Than Significant Impact.		**Operation**: Less Than Significant Impact.
PR-2: *Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*	**Construction**: Less Than Significant Impact. **Operation**: Less Than Significant Impact.	No mitigation measures required.	**Construction**: Less Than Significant Impact. **Operation**: Less Than Significant Impact.
PR-3: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Parks?*	**Construction**: Less Than Significant Impact. **Operation**: Less Than Significant Impact.	No mitigation measures required.	**Construction**: Less Than Significant Impact. **Operation**: Less Than Significant Impact.
TRANSPORTATION			
TRA-1: *Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*	Less Than Significant Impact.	No mitigation measures required.	Less Than Significant Impact.
TRA-2: *Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (Vehicle Miles Traveled)?*	**Construction:** No Impact. **Operations:** No Impact.	No mitigation measures required.	**Construction:** No Impact. **Operations:** No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
TRA-3: *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*	**Construction:** Significant Impact. **Operations:** Significant Impact.	**MM-TRA-A**: **Visibility Enhancements**. Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at ~~for~~ the following locations ~~sufficient to alert drivers to the presence of pedestrians~~: • Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street. • Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks. ~~Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons,~~	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact with Mitigation.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		~~upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing.~~ The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations. **MM-TRA-B**: **Construction Traffic Management Plan:** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		• As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations. • Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes, shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized,	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		temporary traffic signals will be evaluated in coordination with LADOT, and would be implemented by the proposed Project if deemed necessary. • As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods. • Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction. • Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. • Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project ~~bimonthly~~, or as otherwise determined appropriate by City Staff. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. • Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		TRA-PDF-A. Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.	
TRA-4: *Would the project result in inadequate emergency access?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-TRA-B** as defined in **TRA-3**. **MM-TRA-C**: **Temporary Disaster Route Plan**. Prior to the issuance of a building permit for the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall submit a temporary disaster route plan to LADOT, which shall include street closure information and detour plans in order to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Construction activities and temporary lane closures could quickly be halted in event of an emergency to allow emergency vehicles to travel through the work zones. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation. The temporary disaster route plan would be prepared for the following locations:	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		• During those periods when construction of the Alameda Station, the Chinatown/State Park Station, and the Alameda and Alpine Towers require partial closure of one direction or full closure of both directions of Alameda Street or Spring Street.	
TRIBAL CULTURAL RESOURCES			
TCR-1: *Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, in in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*	**Construction:** Significant Impact. **Operations:** No Impact.	Refer to **MM-CUL-D** as defined in **CUL-2**.	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.
TCR-2: *Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource*	**Construction:** Significant Impact. **Operations:** No Impact.	Refer to **MM-CUL-A** and **MM-CUL-D** as defined in **CUL-2**. **MM-TCR-A: Native American Monitor**. Because of the potential to encounter tribal cultural resources, a Native American monitor shall be retained to monitor project-related, ground-disturbing construction activities (e.g., boring, grading, excavation, drilling, trenching) that occur after existing pavement and structures are removed at the location of the Alameda	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		Station. If cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator (as defined in 32 CFR Section 767.8), are likely of Native American origin, then Native American monitoring may be extended to include the area of the find. The Principal Investigator will make the recommendation to the Project Sponsor and Metro if it seems the Native American monitoring should be extended. The appropriate Native American monitor shall be selected based on ongoing coordination with consulting tribes and shall be identified in the CRMMP. The CRMMP is described in Mitigation Measure CUL-A. Specifically, the CRMMP and Native American monitoring would be applicable to ground disturbance activities extending into native soils at the location of the Alameda Station and, if cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator, are likely of Native American origin. Monitoring procedures and the role and responsibilities of the Native American monitor shall be outlined in the CRMMP. In the event the Native American monitor identifies cultural or archeological resources, the monitor shall be given the authority to temporarily halt construction (if safe) within 50 feet (15 meters) of the discovery to investigate the find and	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		contact the archaeological Principal Investigator. The Native American monitor and consulting tribe(s) shall be provided an opportunity to participate in the documentation and evaluation of the find. If a data recovery plan is prepared, the consulting tribe(s) shall be provided an opportunity to review and provide input on the plan.	
UTILITIES AND SERVICE SYSTEMS			
USS-1: *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	**MM-USS-A: Development of a Utility Relocation Plan**. Before the start of construction-related activities, including the relocation of utilities, the Project Sponsor shall coordinate with the Los Angeles Department of Water & Power, the Los Angeles Sanitation & Environment Department, the Southern California Gas Company, and Metro to prepare a Utility Relocation Plan. The Project Sponsor shall also coordinate with the utility companies to minimize impacts to services throughout the Project and obtain their approval of the Utility Relocation Plan. The Utility Relocation Plan shall be prepared, reviewed, and approved by a licensed civil engineer and, at a minimum, include the following: • Plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of the proposed Project;	**Construction:** Less Than Significant with Mitigation. **Operations:** Less Than Significant.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		• Safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines; and • Timing for completion of the utility relocation, which shall be scheduled to minimize disruption to the utility companies and their customers.	
USS-2: *Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant. **Operations:** Less Than Significant.
USS-3: *Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	**Construction:** Less Than Significant. **Operations:** Less Than Significant.
USS-4: *Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-HAZ-A** as defined in **HAZ-1**.	**Construction:** Less Than Significant with Mitigation. **Operations:** Less Than Significant.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
WILDFIRE			
WFR-1: *Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required. **WFR-PDF-A:** The Project will prepare a Fire Protection Plan, which will be implemented during construction of the Broadway Junction, Stadium Tower, and Dodger Stadium Station. The Fire Protection Plan will include the following measures that shall be implemented to the extent applicable in order to further reduce risks associated with ignition of wildland fire: • Prior to the start of any construction activities, a Fire Prevention Program Superintendent shall be designated to interface with the LAFD and coordinate fire watch and site fire prevention and response. • In exceedance of regulatory requirements, the Fire Prevention Program Superintendent shall prohibit hot work construction activities during Red Flag Warnings, which are issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area. • Prior to the start of any hot work construction activities, the Fire Prevention Program Superintendent will implement tiered fire watches with increased staff tasked with monitoring for ignitions during	**Construction:** Less Than Significant. **Operations:** Less Than Significant.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		hot work activities (fire watch). The fire watch shall be provided during hot work and shall continue to monitor for a minimum of 30 minutes following completion of the hot work activities. The Fire Prevention Program Superintendent may determine during construction that this monitoring period be increased based on the potential for weather conditions that may increase the potential for sparks to be carried by the wind and result in ignition (i.e., the potential for high wind events, high temperature, and/or low relative humidity). • Prior to the start of any construction activities, the construction manager in coordination with the Fire Prevention Program Superintendent shall provide site fire safety training for all construction crew members, including on the regulatory requirements set forth in Section 3.20.2, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Project staff shall be trained prior to the start of construction to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. The construction manager shall maintain training records which will be available for review by Metro, the City, and LAFD.	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		• Prior to the start of construction, the construction area shall be cleared of all dead and downed vegetation and dead or dry leaves and pine needles from the ground. Trees within the construction area shall either be removed or trimmed to keep branches a minimum of 10 feet from other trees. Vegetation within the construction area shall be controlled through periodic cutting and spraying of weeds. • Ongoing fire safety inspections and patrols of the construction site shall be integrated into Project site security procedures for the duration of construction. The assigned fire patrols shall verify the proper tools and equipment are on site, serve as a lookout for fire starts, including participating in a fire watch to make sure no residual fire exists following the completion of the construction activity. • Each construction area shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small flames. • The Fire Prevention Program Superintendent shall provide outreach and orientation services to responding fire stations including pre-staging measures prior to the start of hot work construction activities. • Any fire ignited on site shall be promptly reported to LAFD	

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
WFR-2: *Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required. Refer to **WFR-PDF-A** as defined in **WFR-1**. **WFR-PDF-B:** Prior to the start of construction, the Project shall provide a fuel modification zone surrounding the Stadium Tower construction site starting from the construction area perimeter of either 70 feet or until the nearest paved roadway that thins or removes all vegetation, dead or dry leaves and pine needles from the ground, and trims or remove trees to keep branches a minimum of 10 feet from other trees. The Stadium Tower construction site plan shows a buffer zone of 70 feet or to nearest paved roadway.	**Construction:** Less Than Significant. **Operations:** Less Than Significant.
WFR-3: *Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **WFR-PDF-A** as defined in WFR-1 and **WFR-PDF-B** as defined in **WFR-2**.	**Construction:** Less Than Significant. **Operations:** Less Than Significant.
WFR-4: *Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required.	Less Than Significant.
WFR-5: *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required. Refer to **WFR-PDF-A** as defined in WFR-1 and **WFR-PDF-B** as defined in **WFR-2**. **WFR-PDF-C:** During operation of Broadway Junction, Stadium Tower, and Dodger Stadium	**Construction:** Less Than Significant. **Operations:** Less Than Significant.

Potential Environmental Impacts	Significance Determination	Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM)	Significance Determination After Mitigation
		Station, security monitoring by staff and cameras shall be implemented. Project staff shall be trained to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. Any fire ignited on site shall be promptly reported to LAFD.	

Section 2.0 | Introduction

LA Aerial Rapid Transit Technologies LLC, as the Project Sponsor, is proposing the Los Angeles Aerial Rapid Transit Project (proposed Project), which would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles.

This Section 2.0, Introduction, provides an overview of the purpose of this Final Environmental Impact Report (Final EIR), a discussion of the environmental review process and community outreach, and a description of the organization of this Final EIR.

2.1 SUMMARY OF THE PROPOSED PROJECT

The proposed Project would connect LAUS to the Dodger Stadium property via an aerial gondola system. The proposed Project would also include an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS.

The aerial gondola system would consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium, and would provide safe, zero-emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

A detailed description of the proposed Project is provided in Section 3.0, Project Description, of this Final EIR.

2.2 PURPOSE OF THIS FINAL ENVIRONMENTAL IMPACT REPORT

In accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15088, 15089, and 15132, the Los Angeles County Metropolitan Transportation Authority (Metro), as Lead Agency, has prepared this Final Environmental Impact Report (Final EIR) for the Los Angeles Aerial Rapid Transit Project (proposed Project) proposed by LA Aerial Rapid Transit Technologies LLC, as the Project Sponsor. This section provides an overview of the purpose of this Final EIR for the proposed Project. This Final EIR has been prepared to comply with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000 et seq.).

This Final EIR is intended to assist Metro in making decisions regarding the adoption of the proposed Project. It is required by CEQA Guidelines section 15132 to include the Draft EIR or a revision of the draft; comments and recommendations received on the Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Draft EIR, responses to comments received regarding the Draft EIR, and any other relevant information added by the lead agency.

Refinements to the proposed Project since circulation of the Draft EIR, as well as corrections and additions to the Draft EIR, are provided in Section 5.0, Corrections and Additions, of the Final EIR. The Final EIR also contains comments received on the Draft EIR and their responses, as well as updates and clarifications to the text and graphics.

As described in Section 3.0, Project Description, Section 5.0, Corrections and Additions, and Section 6.0, Responses to Comments, of the Final EIR, the proposed Project's refinements and corrections and additions are the result of public comments and community outreach conducted as part of the Draft EIR circulation pursuant to CEQA Guidelines Section 15105. Such modifications would not be considered "significant new information" pursuant to CEQA Guidelines Section 15088.5 as the modifications have been made to portions of the proposed Project alignment already described in the Draft EIR and have been made as a result of lengthy public outreach and discourse such that the public has not been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project or a feasible way to mitigate or avoid such an effect. As shown in Section 5.0, Corrections and Additions, of this Final EIR, the refinements to the proposed Project would not alter the conclusions of the Draft EIR regarding the potentially significant impacts of the proposed Project or result in any new or substantially more severe significant environmental impacts.

2.3 ENVIRONMENTAL REVIEW PROCESS AND COMMUNITY OUTREACH

2.3.1 Notice of Preparation and Scoping Meetings

In accordance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) was prepared and distributed to notify agencies, organizations, and individuals that Metro planned to prepare a Draft EIR, and to request input on the environmental analysis to be performed. The 45-day comment period began on October 1, 2020, and concluded on November 16, 2020, for a 46-day comment period. As part of the EIR scoping process, Project information was made available to the public online through two primary means: 1) a virtual "open house," and 2) an online virtual scoping meeting. The virtual open house was accessible to reviewing parties and the public throughout the 46-day public review period. The virtual open house and online virtual scoping meeting were made accessible through Metro's project website at metro.net/aerialrapidtransit. The NOP and Project fact sheet were posted in the virtual open house, and the virtual scoping meeting was provided in English, Spanish, and Cantonese.

The online virtual scoping meeting was held on October 22, 2020, and included an overview of the proposed Project, an overview of the CEQA process, and the Project timeline for environmental review. The public was also able to submit questions and comments during the online meeting. A recording of the scoping meeting was posted on the Metro website following the meeting.

A total of 305 comments, composed of 8 agency comments, 20 organization comments, 226 individual comments, and 51 comments during the online virtual scoping meeting, were received in response to the

NOP. In addition, an estimated 741 individuals visited the virtual open house and 75 individuals attended the online virtual scoping meeting. The NOP, and the public comments received during the 46-day review period for the NOP, are included in Appendix A of the Draft EIR.

The NOP included two potential alignment alternatives being considered for the proposed Project: the Spring Street Alternative and the Broadway Alternative. Due to feedback received during the scoping process, the Broadway Alternative is now being considered as the proposed Project. The Spring Street Alternative is discussed in Section 4.0, Alternatives, of the Draft EIR.

2.3.2 Draft EIR Public Review Period

Following the public scoping period and NOP release, Metro began developing the Draft EIR. Metro released the Draft Environmental Impact Report ("EIR") for the proposed Project on October 17, 2022, for a 60-day public review period ending on December 16, 2022. On November 15, 2022, Metro extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023. Notice of the release of the Draft EIR, the extension of the public review period, and the public meetings was provided to agencies and interested parties in several ways in compliance with CEQA, as discussed in detail in Appendix A, Public Outreach Report, of the Final EIR.

Metro held a total of eight public meetings immediately before, during, and after the 90-day Draft EIR public review period, including two community information sessions prior to the release of the Draft EIR. Following the release of the Draft EIR for public review, Metro held two informational workshops (one virtual and one in person), and four public hearings (two virtual and two in-person). All informational workshops and public hearings offered Spanish, Cantonese, and Mandarin interpretation, and, following a request for a Taishanese interpreter, the final two public hearings also offered Taishanese interpretation. Metro also provided materials in English, Spanish, Chinese (Traditional), and Chinese (Simplified), both as printed materials at the in-person public meetings, and electronically on Metro's project webpage and the SB 44 website.

An estimated 715[1] attendees participated in the eight public meetings. Metro received 1,132 comments during the Draft EIR public review period via U.S. mail, the project email address, voicemail, and by submitting written and/or oral comments at the four public hearings.

Refer to Appendix A, Public Outreach Report, of this Final EIR, for detailed discussion of the Draft EIR public review period. Refer to Appendix B, Public Hearing Transcripts, and Appendix C, Public Comments on the Draft EIR, of this Final EIR, for copies of all public comments received on the Draft EIR during the public review period, and Section 6.0, Responses to Comments, for responses to comments received on the Draft EIR.

Prior to the release of the Final EIR, Metro hosted two pre-Final EIR release public meetings to provide an update on the proposed Project, with one held virtually via Zoom webinar, and one held in-person in the Project area. Project materials and information were provided at both the in-person meeting and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, Cantonese, and Taishanese. Upon the completion of the Final EIR

[1] The total number of attendees is based on the Zoom webinar attendees for virtual meetings and sign-in sheets for in-person meetings. Because attendees at in-person meetings were not required to sign in, the in-person estimates are an approximation and may not reflect the actual total number of attendees at the in-person meetings.

and other required documentation, the Metro Board of Directors may adopt the findings relative to the proposed Project's environmental effects after implementation of mitigation measures, certify the Final EIR, and approve the proposed Project.

2.4 SENATE BILL 44

Senate Bill (SB) 44, effective January 1, 2022, added section 21168.6.9 to the Public Resources Code and provides for streamlined judicial review for "environmental leadership transit projects," so long as certain requirements are met. To qualify for the streamlined judicial review process established under SB 44, the proposed Project must be an "environmental leadership transit project," defined as a "fixed guideway" that (i) operates at zero emissions; (ii) reduces GHG emissions in the project's corridor "as defined in the applicable environmental document over the useful life of the project, without using offsets"; (iii) reduces 30 million vehicle miles traveled in the project's corridor "as defined in the applicable environmental document over the useful life of the project"; (iv) is consistent with the applicable sustainable communities strategy and regional transportation plan; and (v) incorporates sustainable infrastructure practices. (Cal. Pub. Res. Code § 21168.6.9(a)(1)(A)-(F).

As discussed in detail in Section 1.0, Introduction, of the Draft EIR, and Topical Response A, SB 44, and included in Section 6.0, Responses to Comments, of this Final EIR, the proposed Project meets the definition of an environmental leadership transit project, and has complied with and will comply with all other requirements of Public Resources Code section 21168.6.9, the full and complete text of which is included as Appendix R to this Draft EIR. In particular, and as discussed above, although Public Resources Code section 21168.6.9 only requires one informational workshop and one public hearing, Metro hosted two informational workshops and four public hearings during the Draft EIR public review period.

In addition, in accordance with Public Resources Code section 21168.6.9(e)(1)(A), the required notice is copied below and in Appendix D, Public Resources Code section 21168.6.9 Notice, of this Final EIR:

> THIS ENVIRONMENTAL IMPACT REPORT IS SUBJECT TO SECTION 21168.6.9 OF THE PUBLIC RESOURCES CODE, WHICH PROVIDES, AMONG OTHER THINGS, THAT THE LEAD AGENCY NEED NOT CONSIDER CERTAIN COMMENTS FILED AFTER THE CLOSE OF THE PUBLIC COMMENT PERIOD, IF ANY, FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT. ANY JUDICIAL ACTION CHALLENGING THE CERTIFICATION OR ADOPTION OF THE ENVIRONMENTAL IMPACT REPORT OR THE APPROVAL OF THE PROJECT DESCRIBED IN SECTION 21168.6.9 OF THE PUBLIC RESOURCES CODE IS SUBJECT TO THE PROCEDURES SET FORTH IN THAT SECTION. A COPY OF SECTION 21168.6.9 OF THE PUBLIC RESOURCES CODE IS INCLUDED IN THE APPENDIX TO THIS ENVIRONMENTAL IMPACT REPORT.

2.5 FINAL EIR ORGANIZATION

This Final EIR is comprised of the sections listed below.

1.0 Executive Summary. This section provides an overview of the proposed Project and its potential impacts. Also included in this section are areas of controversy and issues to be resolved, an overview of the public review process that was completed for the proposed Project, and a summary of the alternatives to the proposed Project.

2.0 Introduction. This section briefly discusses the purpose of this Final EIR, the intended uses of this Final EIR, the environmental review process and community outreach efforts, and the contents of this Final EIR.

3.0 Project Description. This section provides a detailed description of the proposed Project, including a description of aerial transit technology generally, the proposed Project's location and local community context, ridership, system operations, construction and project buildout, and required permits and approvals.

4.0 Cost and Financing. This section summarizes the capital, operating, and maintenance costs and planned sources of funding for the proposed Project.

5.0 Corrections and Additions. This section identifies any revisions made to provide more detail, clarify, and/or correct the text and graphics contained within the Draft EIR. These revisions were either initiated by the lead agency or made to address comments received during the public review period. New content is shown in underline and removed content is shown in strikethrough. None of these corrections or additions constitute significant new information which would necessitate a recirculation of the Draft EIR.

6.0 Responses to Comments. This section contains a list of commenting agencies and individuals received by Metro during the public review period for the Draft EIR. Consistent with Section 15088 of the CEQA Guidelines, each of the comments is followed by the corresponding responses to each comment within each comment letter or public hearing verbal comment, that pertain to the analysis and findings contained in the Draft EIR. Copies of the original written comment letters are provided in Appendix C, Public Comments on the Draft EIR, and Appendix B, Public Hearing Transcripts, of this Final EIR.

7.0 Mitigation Monitoring and Reporting Program. This section includes the Mitigation Monitoring and Reporting Program ("MMRP") for the proposed Project. The MMRP lists the mitigation measures and project design features by environmental topic and identifies the responsible party, monitoring agency, enforcement agency, monitoring phase, monitoring frequency, and action(s) indicating compliance.

8.0 Acronyms. This section provides an alphabetical list of acronyms and abbreviations used in the Final EIR.

9.0 List of Preparers. This section lists the individuals involved in the preparation of this Final EIR and the organizations and persons consulted.

10.0 References. This section includes a list of reference and source materials used in the preparation of this Final EIR.

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Section ~~2~~3.0 | Project Description

3.1 ~~2.1~~ OVERVIEW OF THE PROJECT

The proposed Los Angeles Aerial Rapid Transit Project (proposed Project) would connect Los Angeles Union Station (LAUS) to Dodger Stadium property via an aerial gondola system. The proposed Project would also include an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The aerial gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

3.2 ~~2.2~~ ART BACKGROUND

Forms of aerial transit technology have been available and utilized for the last 100 years. Modern applications have seen the evolution of aerial transit technology as a feasible mode of urban rapid transit. The two primary types of aerial transit used in urban environments are tramways and detachable gondolas. In an aerial transit system, cabins are suspended above grade by cables strung between stations and towers. The system is typically electrically powered and is propelled by turning a motorized wheel. Figure 3-1 ~~2-1~~ provides a general overview of how these aerial technology components integrate with each other to deliver a complete aerial system.

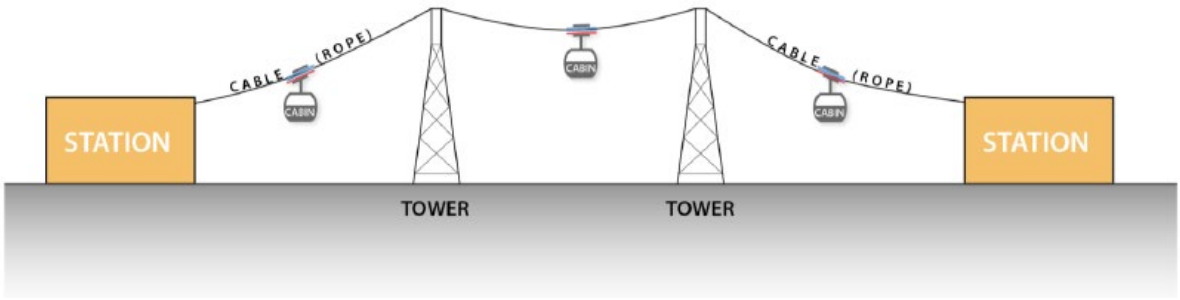

Figure 3-1 ~~2-1~~: Aerial System Key Components

As shown in Table 3-1 ~~2-1~~, modern aerial transit systems are currently operating in several urban locations around the world. Examples of two systems in the United States include the Portland Aerial Tram in Portland, Oregon, and the Roosevelt Island Tramway in New York, New York. An aerial tram system typically has two cabins that shuttle back and forth between two end terminals. An aerial gondola system includes multiple cabins that travel on a continuously circulating cable, which allows for an overall higher system capacity and ability to move more people per hour in each direction. A gondola system also provides flexibility in the ability to add or subtract gondola cabins from the system in order to accommodate demand.

Established aerial gondola transit systems worldwide, such as in La Paz, Bolivia, and Mexico City, Mexico, are being used as rapid transit for the urban population that they serve. The proposed Project would employ a Tricable Detachable Gondola system (also known as "3S").[1,2] 3S Gondola system cabins carry approximately 30 to 40 passengers, more than monocable systems, allowing for higher capacity passenger transport. Similar to the systems used in Koblenz, Germany, Phu Quoc, Vietnam, and Toulouse, France, the proposed Project is expected to provide a smoother, more stable ride than would a monocable system.

3.3 ~~2.3~~ PROJECT LOCATION

The proposed Project is located in the City of Los Angeles, situated northeast of downtown Los Angeles. Figure 3-2 ~~2-2~~ shows the regional location of the proposed Project. The proposed Project would commence adjacent to LAUS and El Pueblo de Los Angeles (El Pueblo) and terminate at Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would include three stations, a non-passenger junction, and three cable-supporting towers at various locations along the alignment. As shown in Figure 3-3 ~~2-3~~, the proposed Project location would generally be located within public right-of-way (ROW) or on publicly owned property, following Alameda Street and then continuing along Spring Street in a northeast direction through the community of Chinatown to the southernmost corner of the Los Angeles State Historic Park. The alignment would then continue northeast over the western edge of the Los Angeles State Historic Park and the Los Angeles County Metropolitan Transportation Authority (Metro) L Line (Gold) to the intersection of North Broadway and Bishops Road. At this intersection, the proposed Project alignment would turn and continue northwest following Bishops Road toward its terminus at Dodger Stadium, located in the Elysian Park community. Figure 3-4 ~~2-3~~ provides an overview of the proposed Project location. A more detailed description of the proposed alignment and Project components is provided in Section 3.5 ~~2.6~~.

3.3.1 ~~2.3.1~~ Local Community Context

The proposed Project would be located within the City of Los Angeles, within the downtown, El Pueblo, Chinatown, Mission Junction, and Elysian Park neighborhoods. A portion of the proposed Project would travel over the Los Angeles State Historic Park. The proposed Project would cross over SR-110 near Dodger Stadium.

[1] The naming convention for this system is derived from the German word "seil", which translates in English to "rope". Hence, Tricable Detachable Gondola systems are known as a "3S" systems due to the use of three ropes, or cables.

[2] Modern applications of aerial transit technology continue to evolve and improve. The Project Sponsor may evaluate similar, feasible technological advancements for urban aerial rapid transit for the proposed Project.

Downtown is characterized by high-density commercial and residential uses and is considered the governmental, financial, and industrial hub of Los Angeles.[3] In the Project area, the El Pueblo de Los Angeles (described further in Section 3.3.3 ~~2.3.3~~ below) is located in the Civic Center district of the Central City Community Plan Area. The Civic Center district is physically bisected by US Route 101 (US-101), which separates El Pueblo from the southern portion of the Civic Center. The Civic Center contains the concentration of civic buildings, including city, county, state, and federal buildings, in downtown, such as City Hall, Kenneth Hahn Hall of Administration, the Hall of Records, and the Federal Court House.

[3] City of Los Angeles Department of City Planning~~,~~. Central City Community Plan, January 2003~~,~~. A~~a~~vailable at: https://planning.lacity.org/plans-policies/community-plan-area/central-city~~,~~. A~~a~~ccessed March 4~~,~~ 2022.

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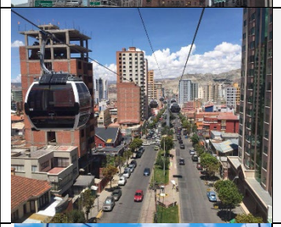
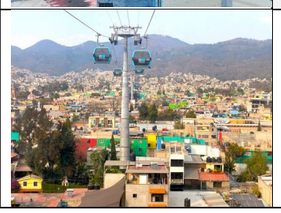
Table 3-1 ~~2-1~~: ART Precedents

Location	Photo	Year Opened	Technology	Capacity (persons per hour, per direction)	Distance	Annual Ridership Estimates	Time	Cabin Size
Portland, Oregon		2007[1]	Reversible Tramway[1]	980[8]	0.62 miles[1]	2.1 million (2016)[12]	4 minutes[1]	79 people[1]
Roosevelt Island, New York		1976 (upgraded 2010)[2]	Reversible Tramway[2]	1,500[9]	0.59 miles[11]	2.7 million (2014)[16]	3 minutes[11]	110 people[11]
La Paz, Bolivia		2014[3] (newest line added 2019)[17]	Monocable Detachable Gondola[3]	3,000[10]	20.3 miles[10]	101 million (gondola network, 2019)[13]	5-17 minutes[10]	10 people[3]
London, England		2012[4]	Monocable Detachable Gondola[4]	2,500[4]	0.68 miles[4]	1.~~2~~5 million (2023~~19~~)[14]	5 minutes[8]	10 people[4]
Mexico City, Mexico (Mexicable)		2016[5] (newest line added in 2023)[26]	Monocable Detachable Gondola[5]	3,000[5]	8.3 miles[5, 26]	7.3 million (2019)[15]	17-29 minutes[5, 26]	10 people[5]
Mexico City, Mexico (Cablebus)		2021[23, 24] (new line to open in 2023)[25]	Monocable Detachable Gondola[24]	4,000[24]	12.26 miles[23]	Not available	26-40 minutes[23, 24]	10 people[24]

Location	Photo	Year Opened	Technology	Capacity (persons per hour, per direction)	Distance	Annual Ridership Estimates	Time	Cabin Size
Koblenz, Germany		2010[6]	Tricable Detachable Gondola (3S)[6]	3,800[6]	0.55 miles[6]	not available	4 minutes[20]	35 people[20]
Phu Quoc, Vietnam		2018[7]	Tricable Detachable Gondola (3S)[7]	3,500[7]	4.9 miles[7]	not available	16 minutes[7]	30 people[7]
Toulouse, France		2022[21]	3S[21]	2,000[21]	1.67 miles[21]	2.5 million[22]	10 minutes[21]	34 people[21]

Sources:

1. Portland Aerial Tram~~,~~. Learn More~~, n.d.,~~ A~~a~~vailable at: http://www.gobytram.com/about. Accessed November 2023.
2. Roosevelt Island Operating Corporation~~,~~. History~~, n.d.,~~ A~~a~~vailable at: https://rioc.ny.gov/169/History. Accessed November 2023.
3. Doppelmayr Garaventa Group~~,~~. 2018. First trip on the Línea Celeste Section 1 and Línea Blanca~~, 2018, January 31,~~. A~~a~~vailable at: https://newsroom.doppelmayr.com/en/doppelmayr/news/first-trip-on-the-l%C3%ADnea-celeste-section-1-and-l%C3%ADnea-blanca/. Accessed November 2023.
4. Doppelmayr Garaventa Group~~,~~. 2020. 10-MGD Emirates Air Line~~, 2020,~~. A~~a~~vailable at: ~~https://www.doppelmayr.com/products/references/10-mgd-emirates-air-line/~~https://www.doppelmayr.com/ko/%EC%A0%9C%ED%92%88/references/10-mgd-emirates-air-line/. Accessed November 2023. ~~The Gondola Project, February 9, 2019, available at: http://gondolaproject.com/category/installat/Data%20shown%20only%20includes%20Mexicable%20and%20does%20not%20include%20Cablebus%20lines%205.ions/cablebus/~~
5. The Gondola Project. 2017. System Dossier: Mexicable. Available at: https://www.gondolaproject.com/2017/07/07/system-dossier-mexicable/. Accessed August 2023.
6. Doppelmayr Garaventa Group~~,~~. 35-TGD BUGA Koblenz~~, n.d.,~~ A~~a~~vailable at: https://www.doppelmayr.com/de/systeme/referenzen/35-tgd-buga-koblenz/. Accessed November 2023.
7. Doppelmayr Garaventa Group~~,~~. 2018. Doppelmayr opens the world's longest ropeway~~, 2018, February 5,~~. A~~a~~vailable at: https://newsroom.doppelmayr.com/en/doppelmayr/press/doppelmayr-opens-the-world/. Accessed November 2023.
8. Dale, Steven, et al. Cable Car Confidential: The Essential Guide to Cable Cars, Urban Gondolas & Cable Propelled Transit. Creative Urban Projects, 2013.
9. POMA. 2010. Aerial Tramway – Airtram Roosevelt Island ~~Senate Hearing Before the Committee on Appropriations,. Department of Transportation and Related Agencies Appropriations for Fiscal Year 1978, 95th Congress, H.R. 7557, United States Government Printing Office Washington, 1978, Google Books,~~. A~~a~~vailable at: ~~https://books.google.com/books?id=MUyomyzyB_EC&pg=PA1612&lpg=PA1612&dq=roosevelt+island+aerial+tram+capacity+of+people+per+hour+per+direction&source=bl&ots=fGboxL5fjB&sig=ACfU3U07UDFZCVm1uzj9jUeQwkzCtGD61w&hl=en&sa=X#v=onepage&q=roosevelt%20island%20aerial%20tram%20capacity%20of%20people%20per%20hour%20per%20direction&f=true~~ https://www.poma.net/en/work/airtram-roosevelt-island/. Accessed November 2023.
10. Mi Teleférico. 2021. Trans-Americas Journey~~, March 18, 2021,~~. A~~a~~vailable at: https://trans-americas.com/mi-teleferico-cable-cars-la-paz-bolivia/. Accessed November 2023.
11. Roosevelt Island Operating Corporation~~,~~. Aerial Tramway Vital Statistics~~, n.d.,~~ A~~a~~vailable at: https://rioc.ny.gov/173/Aerial-Tramway-Vital-Statistics. Accessed November 2023.
12. OHSU News~~,~~. 2017. Portland Aerial Tram Turns 10~~, 2017, January 27,~~. A~~a~~vailable at: https://news.ohsu.edu/2017/01/28/portland-aerial-tram-turns-10. Accessed November 2023.
13. Communication with Cesar Dockweiler who is responsible for design, implementation and operation of Mi Teleférico in La Paz, April 10, 2020.
14. British Broadcasting Corporation. 2023. London cable car: Social media helps boost passenger numbers – TfL. Available at: ~~https://en.wikipedia.org/wiki/Emirates_Air_Line_(cable_car)~~ https://www.bbc.com/news/uk-england-london-65080236. Accessed November 2023.
15. Intertraffic. 2019. Speeding up the Mobility Transition: Victor Jasso Interview (Mexicable)~~, as of August 2019,~~. A~~a~~vailable at: https://www.intertraffic.com/news/infrastructure/speeding-up-in-mobility-victor-jasso-mexicable/. Accessed November 2023.
16. Staten Island NY Local News~~,~~. 2015. Staten Island Tram would require new technology to make trips to Manhattan~~, 2015, June 4,~~. A~~a~~vailable at: https://www.silive.com/news/2015/06/staten_island_tram_would_requi.html. Accessed November 2023.
17. Doppelmayr Garaventa Group~~,~~. 2019. Doppelmayr completes the world's biggest urban ropeway network~~, 2019, March 12,~~. A~~a~~vailable at: https://newsroom.doppelmayr.com/en/doppelmayr/news/doppelmayr-completes-the-world-news/. Accessed November 2023.
18. Sistema de Transporte Masivo y Teleférico~~,~~. Mexicable Línea 2: "Indios Verdes - Hank González" (En Construcción)~~,~~. ~~Retrieved on 2022, August 11,~~ a~~A~~vailable at: https://masivoedomex.blogspot.com/2020/07/mexicable-linea-2.html. Accessed November 2023.
19. In addition to Mexicable, an alternate public gondola transit system was added to the Mexico City Metro System under the name Cablebus, and two lines opened to the public in 2021. https://mexicobusiness.news/infrastructure/news/cablebus-lines-1-and-2-begin-operating-july.
20. Doppelmayr Garaventa Group~~,~~. 2010. 3S Installation BUGA Koblenz 2011~~,~~. ~~2010, November 1,~~ A~~a~~vailable at: https://newsroom.doppelmayr.com/en/doppelmayr/news/3s-installation-buga-koblenz-2011/. Accessed November 2023.
21. POMA~~,~~. 3S Aerial Tramway – TELEO~~, n.d.,~~ A~~a~~vailable at: https://www.poma.net/en/work/teleo/. Accessed November 2023.
22. Personal communication with Mr. Frederic Demoulin, Urban Ropeways Project Manager, Leitner-Poma of America, Inc., on August 12, 2022.
23. Nunez, Lorenzo. 2021. Cablebus Lines 1 and 2 to Begin Operating in July. Available at: https://mexicobusiness.news/infrastructure/news/cablebus-lines-1-and-2-begin-operating-july. Accessed November 2023.
24. Doppelymayr Garaventa Group. Mexico City celebrates its urban Doppelmayr ropeway. Available at: https://www.doppelmayr.com/en/press/gondelbahn-cablebus-mexico-city/. Accessed November 2023.
25. Doppelmayr Garaventa Group. Doppelmayr wins next contract in Mexico City. Available at: https://www.doppelmayr.com/en/news-en/cablebus_linea_3/. Accessed November 2023.
26. Así es la nueva Línea 2 del Mexicable: De Ecatepec a Indios Verdes en 29 minutos, Retrieved on 2023, August 16, available at: https://www.chilango.com/ciudadania/otros-ciudadania/linea-2-mexicable-ecatepec-ndios-verdes-horario-precio-estaciones/.

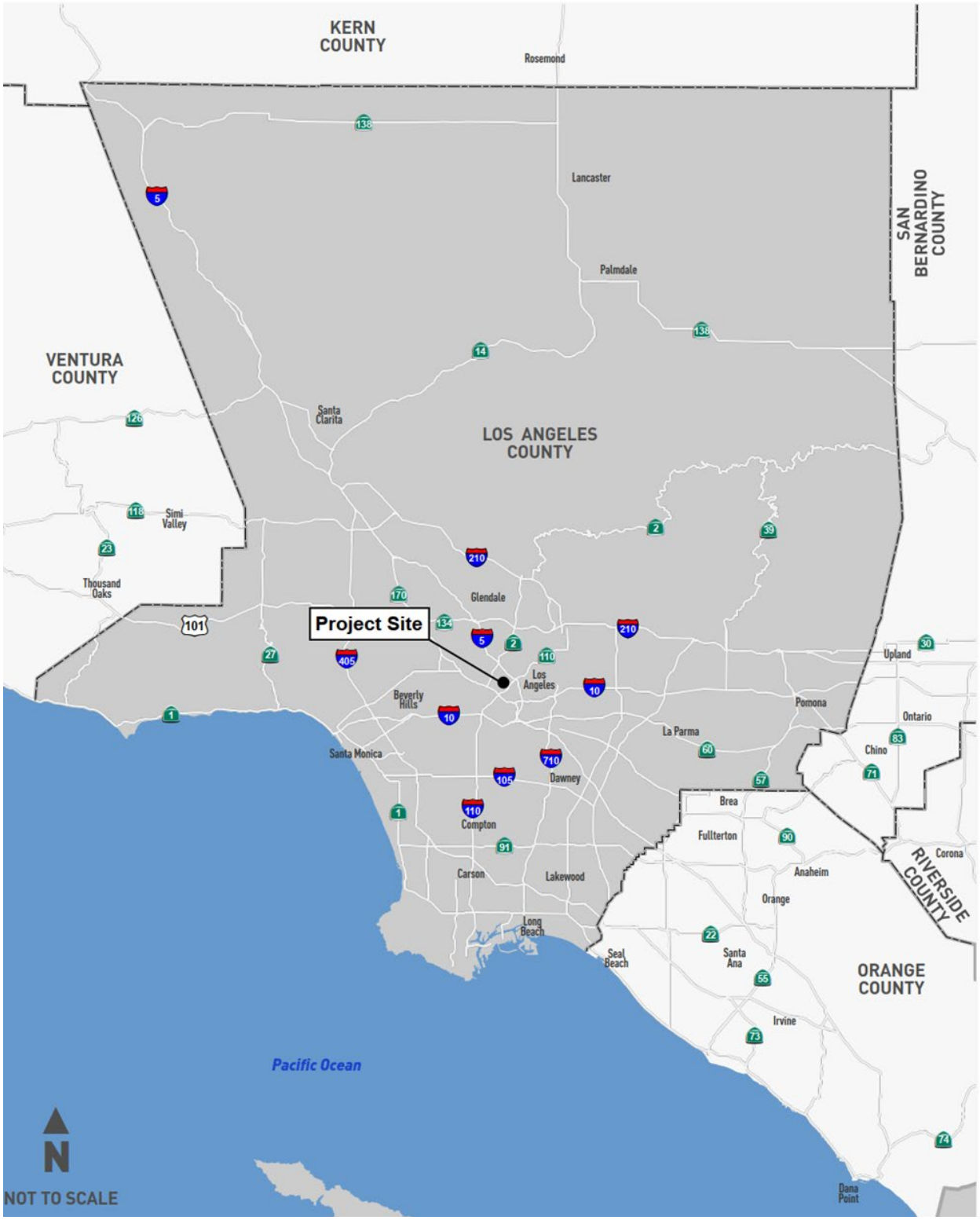


Figure 3-2 ~~2-2~~: Regional Location Map

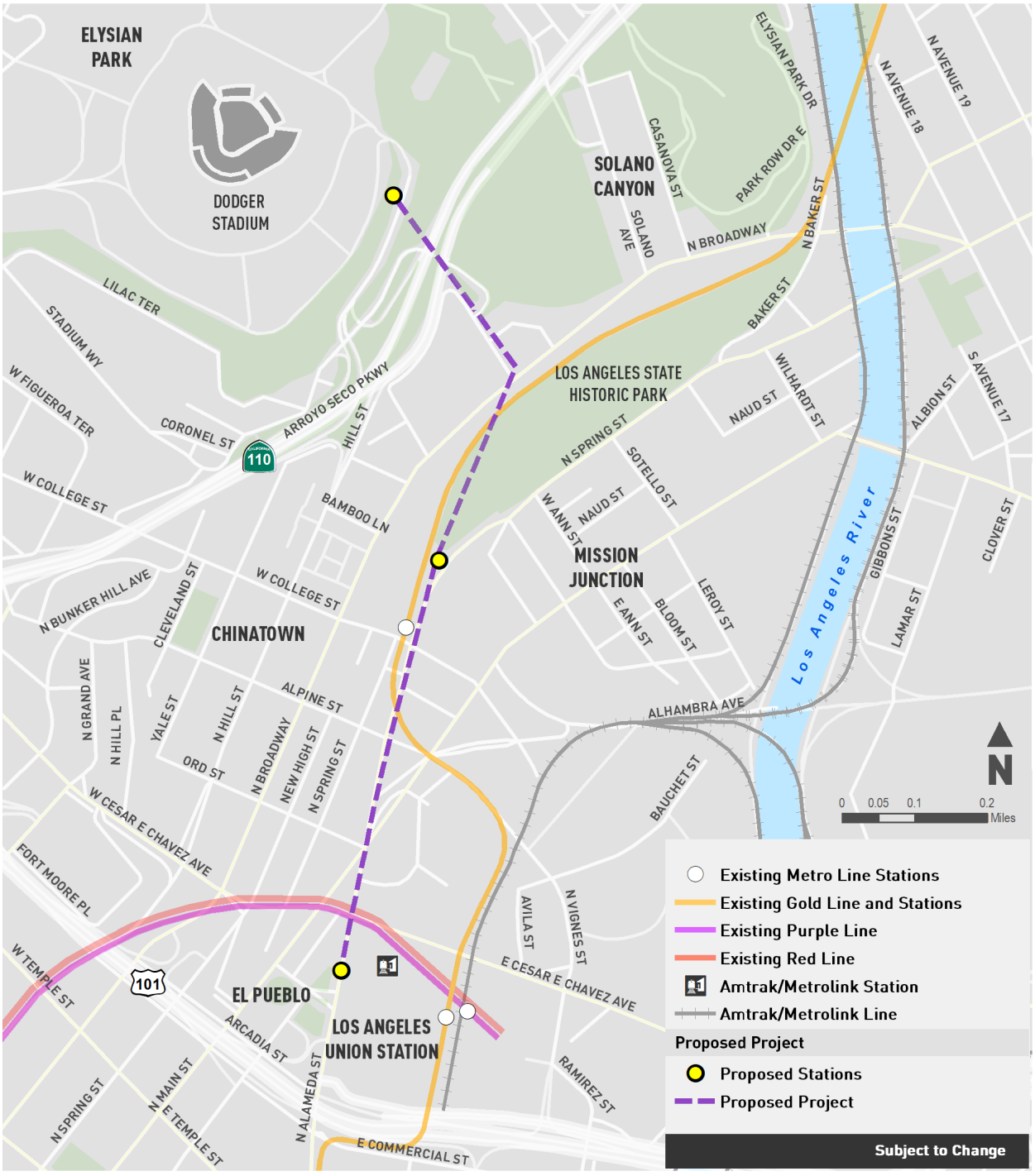


Figure 3-3 ~~2-3~~: Proposed Project Location

LAUS, Chinatown, the Los Angeles State Historic Park, and the Mission Junction neighborhood are located within the Central City North Community Plan Area, which is characterized by low-rise multi-family residential neighborhoods, commercial districts, and industrial uses. The area around LAUS is characterized by transit activity, residential, commercial, and office uses. In the Chinatown community, land uses transition from industrial uses to low-rise commercial and residential uses. The commercial district in Chinatown consists of low-rise buildings with pedestrian-oriented storefronts. As described in the Central City North Community Plan, the businesses in this district provide services for the Chinese population that has historically resided in the area, with restaurants, retail businesses, banks, and professional offices making up an ethnically distinct commercial district that attracts people from throughout the region.[4] Industrial uses in the Project area are primarily centered around the former site of the historic Southern Pacific Railroad Company's River Station railyard, which is located on the present-day site of the Los Angeles State Historic Park. Mission Junction, the area south and southeast of the Los Angeles State Historic Park, includes a mix of low-rise commercial and retail business, light industrial/ warehouse uses, and multi-family residential uses. Farther to the south is the William Mead Homes public housing complex, which is operated by the City Housing Authority and contains over 400 residential units. The Los Angeles State Historic Park is discussed further in Section 3.3.4 ~~2.3.4~~. On May 3, 2023, the Los Angeles City Council approved the Downtown Community Plan (known as DTLA 2040) and new Zoning Code for the Downtown Community Plan Area. DTLA 2040 consolidates the Central City Community Plan and Central City North Community Plan areas. Following the City Council's approval, the City has entered the implementation phase for DTLA 2040, which the City has indicated can take approximately six months to a year.[5] After this process, the City Council will bring DTLA 2040 and the new Zoning Code into effect. The analysis in this EIR is based on the current applicable land use and zoning designations for the Central City Community Plan and Central City North Community Plan areas.

The Elysian Park community is located north of downtown Los Angeles and is characterized by medium-density residential neighborhoods, open space areas, and commercial corridors. The Elysian Park community includes Dodger Stadium (discussed further in Section 3.3.5 ~~2.3.5~~ below), Elysian Park, and Solano Canyon.[6] Dedicated in 1886, Elysian Park is the oldest and second largest park in the City and features hiking trails, a bike path, horseshoe pits, picnic tables, restroom facilities, a recreation center, Little League baseball fields, Grace E. Simons Lodge event venue, Radio Hill Gardens, Chavez Ravine Arboretum and the Chavez Ravine Disc Golf Course.[7] Located in the southeastern portion of the Elysian Park community, Solano Canyon consists of a low-density single-family residential neighborhood, directly east of Dodger Stadium.

3.3.2 ~~2.3.2~~ Los Angeles Union Station

Located at 800 North Alameda Street, LAUS is southern California's primary transportation hub and is a City-designated Historic-Cultural Monument. LAUS provides local and regional access via multiple modes

[4] City of Los Angeles Department of City Planning~~,~~. Central City North Community Plan~~,~~. A~~a~~vailable at: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north~~,~~. A~~a~~ccessed March ~~4,~~ 2022.

[5] See City of Los Angeles Department of City Planning. 2023. Downtown Los Angeles Community Plan Update. Available at: https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about. Accessed August 2023.

[6] City of Los Angeles Department of City Planning~~,~~. 2004. Silver Lake-Echo Park-Elysian Valley Community Plan, August 2004~~,~~. A~~a~~vailable at: https://planning.lacity.org/plans-policies/community-plan-area/silver-lake-echo-park-elysian-valley~~,~~. A~~a~~ccessed August ~~16,~~ 2022.

[7] City of Los Angeles Department of Recreation and Parks~~,~~. 2006. Elysian Park Master Plan, June 2006~~,~~. A~~a~~vailable at: https://www.elysianpark.org/s/EP1_Introduction.pdf~~,~~. A~~a~~ccessed August ~~16,~~ 2022.

of transport and service providers, such as Metro, Metrolink, Amtrak, and municipal and private bus operators, all of which converge at the station. LAUS connects multiple counties, including Los Angeles, Orange, Riverside, San Bernardino, Ventura, and San Diego, via an extensive regional and commuter rail and bus system. Additionally, LAUS connects riders across the Country via Amtrak. LAUS currently attracts up to 36 million transit riders per year; this equates to approximately 100,000 people per day whose journeys depart, transfer, or arrive in Los Angeles via LAUS. By 2040, it is projected that the usership of LAUS will double, where it is anticipated the station will serve up to 72 million people per year, translating to approximately 200,000 daily riders.[8]

Metro purchased LAUS in 2011 and prepared the LAUS Master Plan, which encompasses approximately 38-acres, to guide transforming the station into a world-class transportation facility.[9] According to the LAUS Master Plan, the three programmatic goals for LAUS include (1) transit optimization; (2) creating a great destination; and (3) improved connectivity. In order to accommodate the projected users of LAUS and to improve safety, Metro is developing a number of projects in and around LAUS to increase its functionality as a transportation hub and allow for more connectivity with the surrounding community. Metro's LAUS Forecourt and Esplanade Improvements Project is currently being developed in coordination with the City of Los Angeles, and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street.[10]

In 2015, Metro, in collaboration with the City of Los Angeles, completed the Connect US Action Plan, outlining active transportation strategies to connect people to LAUS, the 1st/Central Regional Connector Station, and the historic neighborhoods surrounding them. The Connect US Action Plan seeks to "transform streets into safer and more beautiful places to walk and bike" and "unify the historic/cultural neighborhoods of El Pueblo, Chinatown, Cornfield Arroyo Seco, Boyle Heights, Arts District, Little Tokyo, and Civic Center." The Connect US Action Plan identified potential pedestrian and bicycle linkages including a proposed esplanade with a walkway and bike path along Alameda Street from the Arts District to College Street, which may be extended north to the Los Angeles State Historic Park.

3.3.3 ~~2.3.3~~ El Pueblo de Los Angeles

El Pueblo de Los Angeles (El Pueblo), also known as the Los Angeles Plaza Historic District, is a national and state registered Historical Monument and City-designated Historic-Cultural Monument located in downtown Los Angeles directly west of LAUS. El Pueblo is historically significant as the birthplace of the City of Los Angeles, established in September 1781 by settlers from present day northern Mexico.[11] The

[8] Los Angeles County Metropolitan Transportation Authority, Los Angeles Union Station Master Plan~~,~~. ~~Los Angeles Union Station Design Report,~~. Aavailable at: https://www.metro.net/projects/la-union-station/~~,~~. Aaccessed March 4, 2022 This document is no longer available online. The Transforming Los Angeles Union Station summary is available at: http://libraryarchives.metro.net/DPGTL/unionstation/2015-transforming-los-angeles-union-station-summary-report.pdf. Accessed November 2023.

[9] Los Angeles County Metropolitan Transportation Authority, Los Angeles Union Station Master Plan~~, available at: http://www.metro.net/projects/la-union-station/~~. This document is no longer available online. The Transforming Los Angeles Union Station summary is available at: http://libraryarchives.metro.net/DPGTL/unionstation/2015-transforming-los-angeles-union-station-summary-report.pdf. Accessed November 2023.

[10] Los Angeles County Metropolitan Transportation Authority~~,~~. 2018. Los Angeles Union Station Forecourt and Esplanade Improvements Project Final Environmental Impact Report~~, March 2018,~~. Aavailable at: https://www.metro.net/about/lausfei/LAUSFEI-FEIR. https://www.dropbox.com/sh/55np14p60s3tch0/AABwyW69bkwUScao1ov2-kD2a/Environment%20Documents?dl=0&subfolder_nav_tracking=1~~,~~. Aaccessed March ~~4,~~ 2022.

[11] City of Los Angeles~~,~~. El Pueblo de Los Angeles Historical Monument, About Us~~,~~. Aavailable at: https://elpueblo.lacity.org/about-us~~,~~. Aaccessed March ~~4,~~ 2022.

Historic District comprises approximately 9.5 acres and is generally bounded by Cesar E. Chavez Avenue to the north, Los Angeles Street and Alameda Street to the east, Arcadia Street to the south, and Spring Street to the west. El Pueblo currently serves as a living museum, attracting over two million visitors per year to its many historic features, including Olvera Street, which is a pedestrian-oriented marketplace containing restaurants, craft shops, and other retail businesses reflecting the Mexican heritage of the City. This area attracts visitors from throughout the region, as well as tourists from around the world. El Pueblo includes the Avila Adobe, the City's oldest surviving residence; Pico House, built by the last governor of California under Mexican rule, and the City's first grand hotel; the Plaza Firehouse, the City's first firehouse; and Our Lady Queen of Angels Catholic Church, the City's oldest church and the only building at El Pueblo still used for its original purpose.[12]

3.3.4 ~~2.3.4~~ Los Angeles State Historic Park

Previously known as the "Cornfields," the Los Angeles State Historic Park is located on the historical site of the Southern Pacific Railroad's River Station, which is a City-designated Historic-Cultural Monument. Since 2005, the site has undergone significant rehabilitation and repurposing into public open space and parkland. In 2014, the Los Angeles State Historic Park was closed to undergo significant renovation. Since its re-opening in 2017, the Los Angeles State Historic Park has welcomed visitors and the local community for passive recreation opportunities, offers guided tours and hosts community events. The Los Angeles State Historic Park hosts various events throughout the year including craft markets, concerts, movie nights, and festivals. These events attract visitors from the surrounding local communities and throughout the region. The revitalized green space provides a location for Angelenos to exercise and socialize in a landscaped setting, within a region that has been historically limited in terms of access to parkland.

Los Angeles State Historic Park comprises 32 acres of open space. The site is bounded by the Metro L Line (Gold) ROW and Broadway to the north, the channelized Los Angeles River to the east, Spring Street and commercial/industrial uses to the south, and Metro L Line (Gold) ROW and commercial/industrial uses to the west. Views of downtown Los Angeles are available from the majority of the site.

The Los Angeles State Historic Park is located adjacent to the Mission Junction neighborhood of the City's Cornfield Arroyo Seco Specific Plan (CASP) Area. The intent of the CASP is to revitalize an underserved vehicular-oriented industrial area by encouraging development of mixed-use, pedestrian-oriented neighborhoods, with higher densities around transit. The area adjacent to the Los Angeles State Historic Park is being intensified with a number of recently approved mixed-use developments, which include both residential units and commercial office spaces.

3.3.5 ~~2.3.5~~ Dodger Stadium

Originally opened in 1962, Dodger Stadium is located at 1000 Vin Scully Avenue and is home to the Los Angeles Dodgers Major League Baseball (MLB) team. The stadium is located on the hillside of Chavez Ravine and overlooks downtown Los Angeles to the south and the San Gabriel Mountains to the north. It is the third oldest continually used ballpark in MLB and has hosted more than 147 million fans since its

[12] City of Los Angeles~~,~~. El Pueblo de Los Angeles Historical Monument, History~~,~~. A~~a~~vailable at: https://elpueblo.lacity.org/history-el-pueblo~~,~~. A~~a~~ccessed March ~~4,~~ 2022.

opening in 1962.[13] Dodger Stadium is the largest MLB stadium in terms of capacity, with approximately 56,000 seats. In addition to MLB games, other special events are hosted at Dodger Stadium throughout the year. The stadium is directly surrounded by surface parking and is accessible via SR-110, US Route 101 (US 101), and Interstate 5 (I-5) freeways as well as surface streets. It is located within the hills of Elysian Park, and is also surrounded by densely populated residential neighborhoods including Solano Canyon, Echo Park, Elysian Park, Silver Lake, Chinatown, and Angelino Heights.

3.3.6 ~~2.3.6~~ Project Purpose, Need, and Objectives

The proposed Project would consist of cables, three passenger stations, a non-passenger junction, three towers, and gondola cabins. The proposed Project alignment would extend approximately 1.2 miles beginning near El Pueblo and LAUS on Alameda Street and ending at the Dodger Stadium property. Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores between Los Angeles Street and Cesar E. Chavez Avenue. Alameda Tower would be located on the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue. Alpine Tower would be located on a City-owned parcel, currently being used as non-public parking storage for City vehicles, at the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. Broadway Junction is a non-passenger junction that would be located at the intersection of North Broadway and Bishops Road. Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate and SR-110. Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate.

3.3.7 ~~2.3.7~~ Purpose and Need

The proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/ State Park Station. The proposed Project would include a mobility hub at Chinatown/State Park Station. The proposed Project would also provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. The proposed Project is needed to alleviate existing congestion and associated air pollution while providing safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways.

Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. In addition to traffic delays in and around local streets, congestion occurs on the nearby freeways, including SR-110, I-5, and US 101. The communities in the vicinity of the proposed Project alignment were identified as being in the

[13] Major League Baseball~~,~~ Dodger Stadium History~~,~~ A~~a~~vailable at: https://www.mlb.com/dodgers/ballpark/information/history~~,~~ A~~a~~ccessed March ~~4,~~ 2022.

90 - 100 percentile of communities disproportionately burdened by multiple sources of pollution in the State.[14] As the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion.[15]

Dodger Stadium is one of the region's most visited venues; however, there are no permanent transit connections to the venue. Currently, Dodger Stadium Express buses provide a connection between LAUS and Dodger Stadium on game days, carrying approximately 1,850 riders on average per game. Other high-capacity venues in the region include the Crypto.com Arena, which hosts the Los Angeles Lakers and Los Angeles Clippers professional basketball teams and Los Angeles Kings professional hockey team; the Los Angeles Memorial Coliseum, which hosted the Los Angeles Rams professional football team between 2016 and 2019 and hosts the University of Southern California collegiate athletic events; and the BMO ~~Banc of California~~ Stadium, home to the Los Angeles Football Club (LAFC). These venues are accessible directly by public transit, including the Metro A Line (Blue) and E Line (Expo). Additionally, the new SoFi Stadium in Inglewood, which began hosting the Los Angeles Rams and Los Angeles Chargers professional football teams in 2020, will be accessible via a planned people mover connecting the future Metro Crenshaw/LAX line station to the stadium.[16, 17] The Intuit Dome, the future home of the Los Angeles Clippers professional basketball team, is anticipated to open in 2024 and will also be served via the planned people mover connecting the future Metro Crenshaw/LAX line station to the center.[18] [19] As such, there is an increased need for Dodger Stadium to seek additional transit connections. Metro acknowledges that there is a need for improved transit options that link with the growing Metro network to meet existing and future travel demands and access to Dodger Stadium.

[14] California Office of Environmental Health Hazard Assessment~~,~~. CalEnviroScreen 4.0 Map~~,~~. Available at: https://oehha.ca.gov/calenviroscreen/maps-data~~,~~. A~~a~~ccessed August ~~16,~~ 2022.

[15] Southern California Association of Governments~~,~~. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, or "Connect SoCal." A~~a~~vailable at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176~~,~~. A~~a~~ccessed August ~~11,~~ 2022.

[16] California State Transportation Agency~~,~~. 2020. Transit and Intercity Rail Capital Program, Fourth Round Selected Project – Project Detail Summary, April 2020~~,~~. A~~a~~vailable at: https://calsta.ca.gov/-/media/calsta-media/documents/2020-tircp-detailed-project-award-summary.pdf~~,~~. A~~a~~ccessed March ~~4,~~ 2022.

[17] Los Angeles County Metropolitan Transportation Authority~~,~~. Crenshaw/LAX Transit Project~~,~~. A~~a~~vailable at: https://www.metro.net/projects/crenshaw_corridor/~~,~~. A~~a~~ccessed March ~~4,~~ 2022.

[18] Intuit~~NBA.com,~~. Intuit Dome~~,~~. A~~a~~vailable at: ~~https://www.nba.com/clippers/intuitdome~~ https://www.intuit.com/intuitdome/~~,~~. A~~a~~ccessed November~~June 28,~~ 20~~22~~3.

[19] City of Inglewood~~,~~. Inglewood Transit Connector Project Final Environmental Impact Report~~,~~. A~~a~~vailable at: https://www.cityofinglewood.org/DocumentCenter/View/17236/ITC_FEIR_Feb2022. Accessed November 2023.

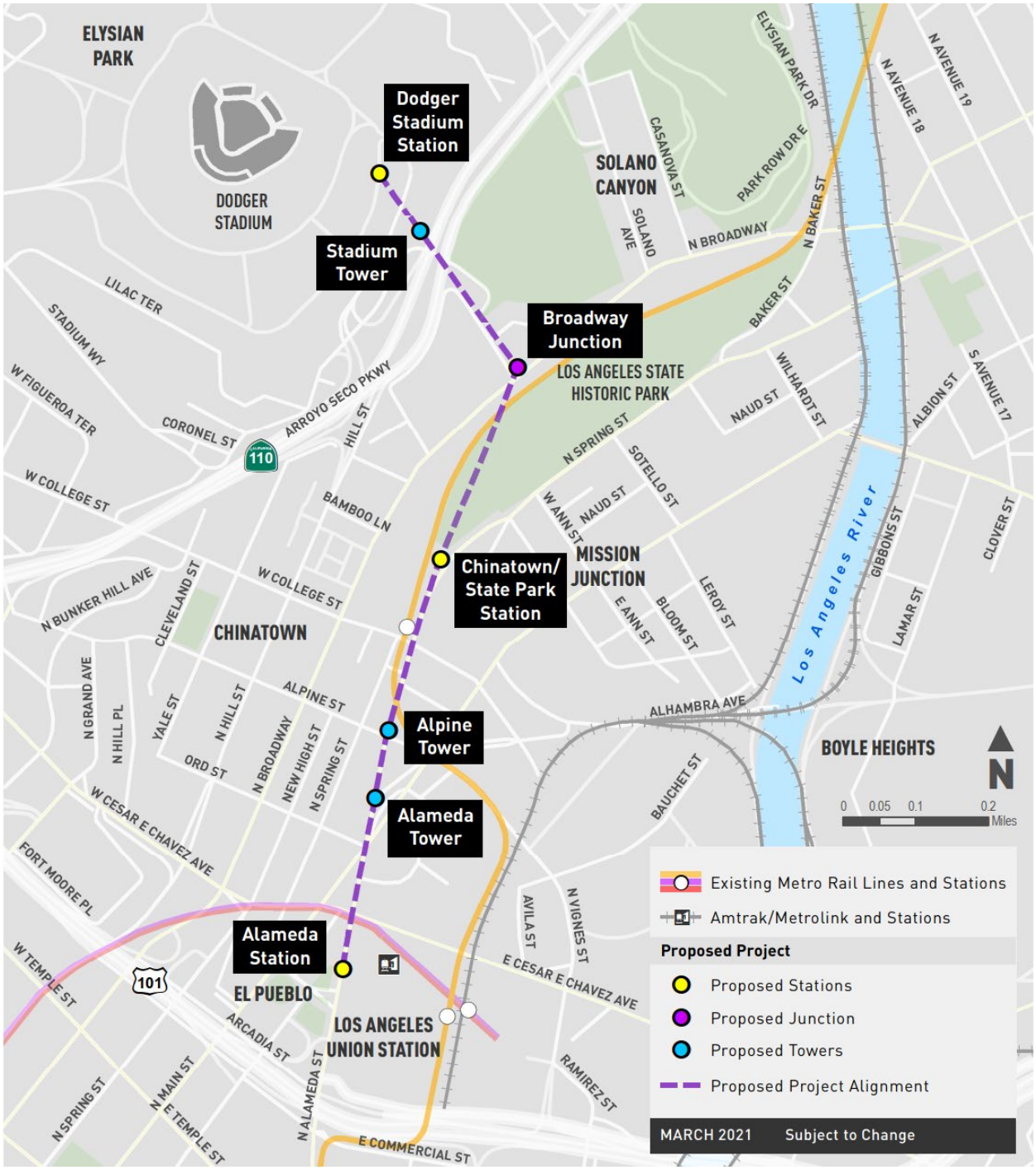


Figure 3-4 ~~2-4~~: Proposed Project Alignment

Within two hours prior to the start of and after a game or event at Dodger Stadium, more than 10,000 people could be transported to the stadium via the proposed Project. The average attendance at a Dodger game was approximately 49,000 for the 2019 season.[20] Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

When complete, the travel time from LAUS to Dodger Stadium would be approximately seven minutes during peak operations (games/events at Dodger Stadium). By creating a high-quality and high-capacity rapid transit connection between LAUS and Dodger Stadium, the proposed Project would provide a more viable choice in making a trip to a Dodger game or event at the stadium. With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access Dodger Stadium via public transit.

The proposed Project, which would include passenger stations at LAUS, the southern entrance of Los Angeles State Historic Park, and Dodger Stadium, would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon. With the proposed Project's ability to overcome grade and elevation issues, while providing safe, zero-emissions, environmentally-friendly, and high-capacity transit connectivity, the proposed Project would operate daily to link the Dodger Stadium property and the neighborhoods along the proposed alignment to the region's rapidly growing regional transit system at LAUS.

3.3.8 ~~2.3.8~~ Project Objectives

The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

The proposed Project objectives are as follows:

- Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- Attract new transit riders to the Metro system through a unique experience of an aerial transit system connecting to Dodger Stadium.
- Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.

[20] ESPN.com~~,~~. 2019. MLB Attendance Report – 2019~~,~~. A~~a~~vailable at: http://www.espn.com/mlb/attendance/_/year/2019~~,~~. A~~a~~ccessed March ~~4,~~ 2022.

- Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
- Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.
- Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
- Bring a world class aerial transit system to the Los Angeles area.
- Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.
- Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.
- Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project.
- Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.
- Maximize the Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

3.4 ~~2.4~~ DESCRIPTION OF THE PROPOSED PROJECT

The proposed Project would connect LAUS and the Dodger Stadium property through an aerial gondola system. The proposed Project would utilize a detachable "3S", or tricable, technology that enables larger passenger cabins and more carrying capacity than other available aerial technology to support the transit demand created during Dodger games and events at Dodger Stadium. The proposed Project would also provide transit access to the Los Angeles State Historic Park and the surrounding communities. The aerial technology that comprises an aerial gondola system consists of major components connected by the cables (ropeway). The major components of the proposed Project include stations where passengers would enter and exit the system, a non-passenger junction where the alignment turns, towers to support the cables, and cabins in which the passengers ride.

3.4.1 ~~2.4.1~~ Design

The proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. Of equal importance is the desire to minimize the perceived scale and mass of the stations and non-passenger junction. The proposed architectural design, therefore, takes advantage of a

simple barrel vault form to provide the minimum enclosure needed to protect the ropeway equipment and provide shade and weather protection to passengers on the boarding platform. This barrel form would utilize a hollow structural steel section structure and metal panel assembly to allow the introduction of custom perforation patterns that take cues from the immediate neighborhood culture, while also providing a visual lightness to the form. The canopy of the non-passenger junction has the potential to diverge from this assembly, utilizing a clipped system of narrow metal tubes to create a pattern, while still achieving a transparency that brings lightness to the form. Rather than proposing a single uniform color palette for the entire system, colors for the material finishes at each station and junction will be selected to be complementary to each of their respective sites and surrounding urban fabric. Each station could also provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture, and could be commissioned from local artists. Figure 3-5 ~~2-5~~ depicts the illustrative design of Alameda Station for the proposed Project.

Each of the towers would be designed so that their bases would not impede adjacent vehicular and pedestrian circulation, while supporting the ropeway and cabins that are primarily aligned above the public ROW. The resulting tower structure gently swoops from the base up to connect to the ropeway. A light-toned gray high performance coating will accentuate the faceted steel panels that comprise the tower's swooping form. The neutral light-tone gray is intended to conform with the surrounding urban environment and will not provide a highly metallic or mirrored finish to minimize glare. Figure 3-6 ~~2-6~~ depicts the illustrative design of towers for the proposed Project.

3.4.2 ~~2.4.2~~ Cables and Ropeway Technology

Aerial gondola systems are classified based on the number of cables (ropes) used in their operation. The proposed Project would use a detachable 3S system, which relies on three steel cables to support and move the cabins. This tri-cable technology enables the highest capacity of any aerial gondola system, as it is able to accommodate larger cabins and longer spans while providing greater lateral stability.

Due to the length and geometry of the proposed Project, it is anticipated that two ropeway systems would be used. The first section would carry passengers from Alameda Station to Broadway Junction. The second section would carry passengers from Broadway Junction to Dodger Stadium Station. The transition between the two systems would occur in Broadway Junction in a manner inconspicuous to the passengers. No change of cabins would be required to travel through Broadway Junction.

The proposed Project's tri-cable technology would be comprised of two stationary cables (track ropes) that provide support for the running wheels of the cabins, and a third cable (haul rope) that would circulate continuously around the system. The haul rope is looped around two sheaves – the "drive bullwheel" at one station/junction and the "return bullwheel" at the opposing station/junction. The haul rope, which is the propulsion rope, is moved by the turning of the drive bullwheel. The drive bullwheel is turned by motors located at the station or junction. The return bullwheel acts like an idler wheel providing haul rope location control, but no motive power. The haul rope moves at a steady pace around the bullwheels pulling the cabins along the ropeway and in and out of each station or junction. As cabins enter the station, they detach from the haul rope. Once a cabin is detached from the haul rope, the cabin can move at a speed independent of the haul rope, allowing the cabins "online" (i.e., not in a station) to continue to move at a higher speed while the cabins in the station slow down for unloading and loading.

Devices known as slack carriers would be used to support and maintain proper separation between the cables. Slack carries would be attached to the system's two track ropes and provide support sheaves for the haul rope. While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phase of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350-500 feet with adequate separation from the stations, junction, and towers.

One haul rope loop would be for the ropeway system between Alameda Station and Broadway Junction, and one haul rope loop would be for the ropeway system between Broadway Junction and Dodger Stadium Station. For the section from Alameda Station to Broadway Junction, the drive bullwheels and associated motors and drive equipment are anticipated to be at the Broadway Junction and the return bullwheels would be located at Alameda Station. At Chinatown/State Park Station within this section, sheaves would control the haul rope. For the section from Broadway Junction to Dodger Stadium Station, the drive bullwheels and associated motors and drive equipment are anticipated to be at Dodger Stadium Station, and the return bullwheels would be located at Broadway Junction. The track ropes end at stations or the junction. Within the stations or junction, track ropes are wrapped around large bollards. Additional length of track rope is supplied and stored in spools within a station or junction for future use. The system includes a tension system to maintain rope tension and the appropriate ropeway sags.

Figure 3-5 ~~2-5~~: Illustrative Design of a Station ***This illustrative design depicts Alameda Station**

Figure 3-6 ~~2-6~~: Illustrative Design of a Tower ***This Illustrative design depicts Alameda Tower in the foreground and Alpine Tower in the middle ground.**

3.4.3 ~~2.4.3~~ Stations and Junction

The proposed Project would include three passenger stations and one non-passenger junction. The basic elements of each station include mechanical, electrical, and plumbing systems, boarding platforms, and vertical circulation (e.g., stairs, escalators, and elevators). The stations also would include areas for ticketing, fare checking, and queueing (described in Section 3.7.2 ~~2.8.2~~ below); loading and unloading of passengers; operations; and system equipment. Stations would be secured nightly by closing the vertical access to the platforms. Security monitoring would be provided by staff and by cameras, which would feed into the control rooms constructed at each station and the system control room at Dodger Stadium Station. Each station would be staffed at all times during operations. During non-operational hours, Dodger Stadium Station would be staffed with personnel performing maintenance and other activities, and operators in the control room would monitor activities throughout the proposed Project.

The boarding platforms at Alameda Station and Chinatown/State Park Station would be elevated so that the cabins have sufficient space to travel above people, cars, trees, and other urban elements in the immediate vicinity of these stations. The cabins would descend into the station and ascend as they leave the station. Dodger Stadium Station would be designed so that passengers would unload and load at ground level. The length and sizing of the arrival/departure platforms would be designed to accommodate the space needed for cabin deceleration and acceleration, and would be compliant with the accessibility requirements of the Americans with Disabilities Act (ADA). As cabins enter a station, they would detach from the haul rope and be under the control of tire conveyors, which are made up of a series of tires in stations and junctions that move the cabins, including to decelerate and accelerate, while the cabins are detached from the haul rope. The cabin would slow down as it enters the station to a speed at which the passengers could exit, and the cabin doors would then open allowing passengers to exit and enter the cabin.

At Alameda Station and Dodger Stadium Station, the cabin doors would open, and passengers would unload. The cabins would then execute a U-turn in the station before passing through the load zone for passengers. Upon reaching the end of the load zone, the doors would close. The cabins would then speed up until the cabin speed matches that of the haul rope, and the cabin would reattach to the haul rope and depart the station. At Chinatown/State Park Station, the process would be similar, except the cabins would not execute a U-turn. Rather, they would detach from the haul rope, slow to boarding speed, open the doors for exit and entry, close the doors, speed up, and reattach to the haul rope.

The junction would be a non-passenger facility that is required for the ART system in order to turn the cables of the proposed Project and remain along the alignment. The junction would include mechanical systems, including equipment necessary for the cabins to detach from the haul rope, slow to a speed to turn, accelerate, and then reattach to the haul rope. The junction would also include vertical circulation (i.e., elevators and stairs) for maintenance access.

At each end of a station or junction, the rope position would be controlled by a pressure frame, which would support and guide the ropes. The pressure frames also provide a means for transitioning cabins from the ropes to the station or junction equipment. The approximate lengths of the pressure frames at each of the proposed Project stations and junction are anticipated to be: Alameda Station – 40 feet;

Chinatown/State Park Station – 40 feet (south end) and 60 feet (north end); Broadway Junction – 60 feet (south end) and 40 feet (west end); and Dodger Stadium Station – 60 feet.

Within the stations and junction, overhead bridge cranes would allow the insertion or removal of equipment as may be required for maintenance activities.

3.4.4 ~~2.4.4~~ Towers

The proposed Project would require three towers to be constructed between the stations and the junction. The towers would be designed as monopoles and would support the steel cables required for the 3S system described in Section 3.4.2 ~~2.5.2 above~~. The towers would be built to current seismic and structural standards.

Additionally, at towers, mechanical equipment would provide rope control and maintenance functions. The track ropes are supported by the profile beams. Between the profile beams, the haul rope rides on a series of wheels, or sheaves, which maintain the rope position. A hoisting gantry is provided at the towers to perform heavy maintenance activities. The ropeway equipment is supported atop the tower by the crossarm.

3.4.5 ~~2.4.5~~ Gondola Cabins

The proposed Project would utilize 3S gondola cabins. As discussed in Section 3.4.2 ~~2.5.2~~, 3S technology enables larger passenger cabins and, thus, more carrying capacity than other available aerial gondola technology. The 3S cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. The cabins would allow for sitting or standing; would accommodate wheelchairs, baby strollers, and bicycles; and would be fully ADA accessible.

Cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Each cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Each cabin would have a set of two sliding doors that open and close automatically under safety controls in stations. Cabin windows ~~could~~ can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted.

The cabins would move at a maximum speed of 13.4 miles per hour during peak operations. As they enter a station, the cabins would slow down to a speed of roughly one foot per second (less than one mile per hour) to allow passengers to enter and exit the moving cabin. This is achieved by detaching the cabins from the haul rope in the station. Once a cabin is detached from the haul rope, the cabin can move at a speed independent of the haul rope, allowing the cabins "on line" (i.e., not in a station) to continue to move at a higher speed. If needed, a cabin could be stopped to accommodate passenger boarding. At peak operations, it is anticipated cabins would arrive in a station approximately every 23 seconds and, once a new load of passengers has boarded, the cabin would re-attach to the cable and advance to the next station. Outside of stations, moving cabins would be spaced approximately 450 feet from one another during peak operations.

3.4.6 ~~2.4.6~~ Aerial Clearance

Industry standards for the design and operation of ropeways and cabins are documented in the American National Standards Institute (ANSI) Standard B77.1, which is developed in coordination with manufacturers, consumers, and regulators. ANSI B77.1 regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles, pedestrians, vegetation, buildings, and other structures. ANSI B77.1 provides minimum clearance requirements depending on the nature of the element and whether the clearance is vertical or horizontal.

To define the width of the ropeway path which must be clear of elements, the horizontal clearance outside of the cabin paths as required by the ANSI B77.1 safety standard for passenger ropeways was used.[21] ANSI B77.1 includes two criteria, both of which must be met, for horizontal clearance between the cabin and an adjacent element: when hanging vertically, the cabins must be no closer than five feet to any obstruction that is not part of the ropeway system; and when the cabins are tilted within a prescribed range (as from wind), the cabins must not come into contact with anything. For the proposed Project, the five-foot requirement is slightly wider than the swing requirement, so the five-foot requirement controls the design path width. The proposed Project would include five feet on each side of the vertically hanging cabins for a required aerial clearance width of 53 feet 2 inches. The proposed Project would also include an Additional Separation Buffer. Figure 3-7 ~~2-7~~ depicts the proposed Project's anticipated aerial rights requirements and the Additional Separation Buffer.

Based on the current design, the Additional Separation Buffer is estimated to be approximately 10 feet on each side of the required aerial clearance width based on applicable standards, requirements, building codes, and guidelines. The proposed Project's Additional Separation Buffer would comply with applicable standards, requirements, building codes, and guidelines as determined by the City of Los Angeles and Metro. The final width of the Additional Separation Buffer would be determined by the appropriate agencies during the permitting process for the proposed Project.

Vertical clearances are dependent upon the nature of the element below the ropeway and cabins. ANSI B77.1 requires the following vertical clearances: vehicles – five feet,[22] vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with authority having jurisdiction. Subject to these ANSI B77.1 requirements, vehicles, vegetation or terrain, pedestrians, buildings, and roadways or railways are permitted below the ropeway and cabins.

The above discussion addresses ANSI B77.1 - 2017 and ANSI B77.1 – 2022 requirements for clearances. While California has not codified the 2017 or 2022 versions of ANSI B77.1, the State follows industry best practices and the current version of ANSI B77.1 is considered the de facto requirement by the California Division of Occupational Safety and Health (Cal/OSHA), the agency responsible for the regulation of passenger ropeways within California. The proposed Project would meet and anticipates exceeding the ANSI B77.1 – 2017 and ANSI B77.1 – 2022 requirements for clearances.

[21] American Nat'l Standards Inst., ANSI B77.1-2017 Passenger Ropeways – Aerial Tramways, Aerial Lifts, Surface Lifts, Tows and Conveyors – Safety Standard. On May 5, 2022, ANSI B77.1-2022 was approved and is in publication. The aerial clearance requirements of ANSI B77.1 are unchanged in the revision from 2017 to 2022.

[22] While ANSI B77.1 requires five feet for vehicles, the proposed Project is providing a minimum of 28 feet above roadways.

3.5 ~~2.5~~ PROPOSED PROJECT ALIGNMENT AND COMPONENTS

The proposed Project "alignment" includes the suspended above-grade cables and cabins following the position of the Project components along the proposed alignment from Alameda Station to Dodger Stadium Station. The proposed alignment and locations, heights, widths, sizes, and design of the Project components listed in Section 3.5.1 ~~2.6.1~~ are approximate and may change slightly during final design based on the discretionary entitlements, reviews, and approvals required for implementation of the proposed Project.

3.5.1 ~~2.5.1~~ Proposed Project Alignment

The proposed Project alignment described below is preferred because it best accommodates various technical and design objectives and considerations.

The proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. Figure 3-8 ~~2-8~~ shows the portions of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property. *Proposed Alignment Plan and Profile* (Appendix Q) includes additional detail as to the public ROW, publicly owned property and private properties.[23] Additional considerations for the location of the proposed alignment included minimizing utility relocations, reducing changes to travel lanes, parking lanes, and bicycle and pedestrian circulation, location of historic and archaeological resources, and use of uneven or difficult topography. The proposed alignment profile is provided in *Proposed Alignment Plan and Profile* (Appendix Q).[24]

[23] Refer to Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of this Final EIR, for supplemental graphics as to the proposed Project alignment plan and profile, provided in response to comments on the Draft EIR for informational purposes, as larger scale insets of the graphics originally provided in Appendix Q of the Draft EIR.

[24] *Ibid*.

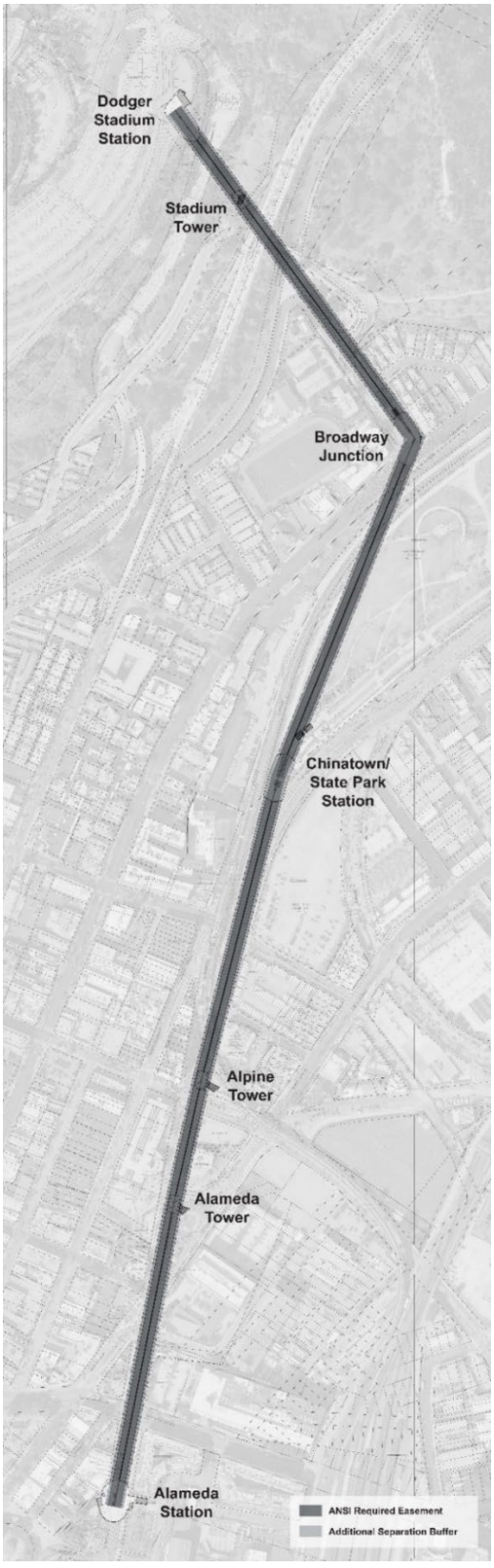


Figure 3-7 ~~2-7~~: ANSI Requirements and Additional Separation Buffer[25]

[25] A larger scale inset of this graphic, originally provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, has been provided in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of the Final EIR.

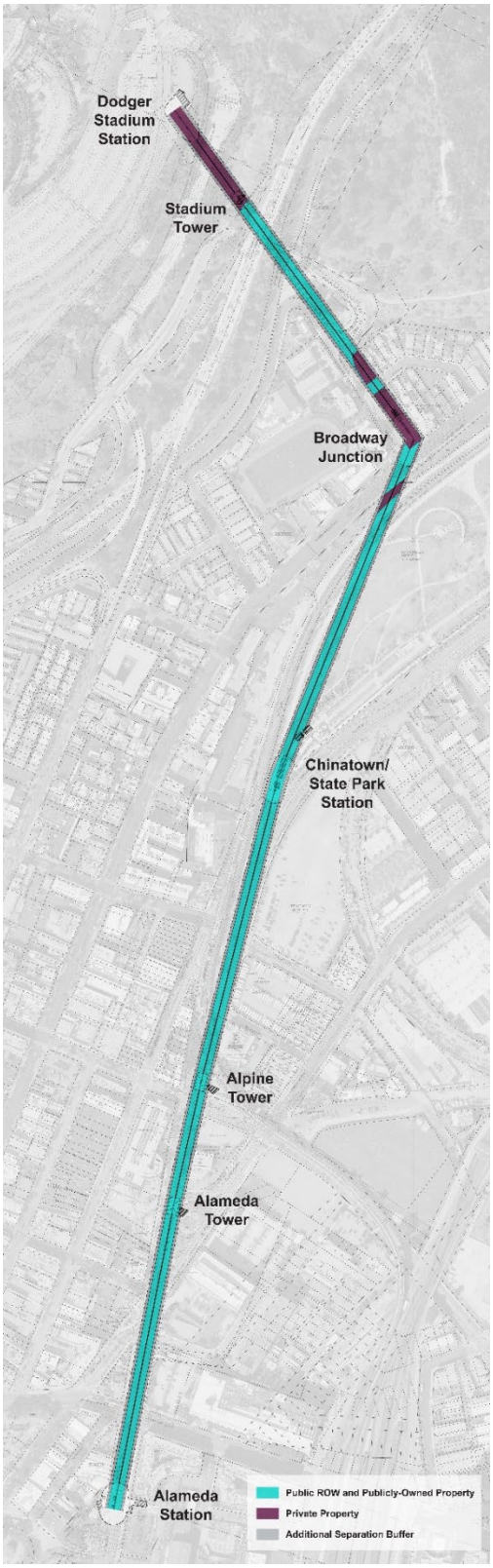


Figure 3-8 ~~2-8~~: Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property[26]

[26] A larger scale inset of this graphic, originally provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, has been provided in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of the Final EIR.

The proposed Project alignment would extend approximately 1.2 miles beginning near El Pueblo and LAUS on Alameda Street. The proposed Alameda Station would be constructed over Alameda Street between Los Angeles Street and Cesar E. Chavez Avenue, adjacent to the Placita de Dolores and planned LAUS Forecourt. The location of Alameda Station was selected because it maximizes the proposed alignment over public ROW and publicly owned property and minimizes aerial rights over private properties. The Alameda Station location was also selected because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access. The location is also compatible with Metro's plans at LAUS, including the planned LAUS Forecourt and Esplanade Improvements Project. Additional considerations include minimizing impacts to historic and archaeological resources.

From Alameda Station, the proposed Project alignment would remain primarily above the public ROW with portions above private property, and travel north along Alameda Street to the proposed Alameda Tower, which would be constructed on the Alameda Triangle, a portion of City ROW between Alameda Street, North Main Street, and Alhambra Street.

From Alameda Tower, the proposed Project alignment would continue north along Alameda Street and cross Alpine Street. The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on City-owned property. In the process of selecting tower locations, the proposed Project prioritizes the use of public property and minimizes private land acquisition, and also considers the proposed Project's relationship to existing adjacent and potential future land uses. Technical considerations of tower locations also include~~s~~ optimizing the height of the towers and minimizing the number of towers. Additionally, the proposed Project limits the bend on the towers to less than two degrees.

From Alpine Tower, the proposed Project alignment would follow the public ROW and continue over the elevated Metro L Line (Gold). North of College Street, Alameda Street becomes Spring Street, and the proposed alignment would generally follow Spring Street in a northeast trajectory until it reaches the southernmost point of Los Angeles State Historic Park, where the proposed Chinatown/State Park Station would be constructed partially on City ROW and partially within the boundaries of the Los Angeles State Historic Park. The Chinatown/State Park Station location minimizes the proposed Project's footprint within the Los Angeles State Historic Park.

The alignment then crosses over the western edge of the Los Angeles State Historic Park and the Metro L Line (Gold) tracks. The Chinatown/State Park Station location avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway.

The proposed Project alignment would continue traveling north towards the intersection of North Broadway and Bishops Road. Broadway Junction would be located at the northern corner of the intersection of North Broadway and Bishops Road (1201 North Broadway). From Broadway Junction, the proposed Project alignment would travel northwest primarily along Bishops Road, with portions above private property, crossing over SR-110 towards Dodger Stadium. The proposed Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate entrance road to

Dodger Stadium and SR-110. The northern terminus of the system would be located in a parking lot at the Dodger Stadium property, where the proposed Dodger Stadium Station would be constructed.

3.5.1.1 ~~2.5.1.1~~ Alameda Station

Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores between Los Angeles Street and Cesar E. Chavez Avenue. The station would be approximately 173 feet long, 109 feet wide, and 78 feet high at its tallest point, with the passenger loading platform approximately 31 feet above Alameda Street. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas to the station, would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as a parking and loading area for El Pueblo. Figure 3-9 ~~2-9~~ is an illustrative drawing showing the proposed new pedestrian plaza at El Pueblo. On the east, vertical circulation elements would be introduced at-grade from the planned LAUS Forecourt. Installation of the vertical circulation elements may include removal of approximately 12 trees, removal of parking and loading for El Pueblo, and installation of landscaping and hardscape. Figure 3-11 ~~2-10~~ shows the proposed location of the Alameda Station, and Figure 3-12 ~~2-11~~ shows cross sections of the station.

Figure 3-9 ~~2-9~~: Proposed Pedestrian Plaza at El Pueblo

3.5.1.2 Alameda Tower

Alameda Tower would be located on the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue consisting of a small green space flanked on all sides by roadways. Alameda Tower would be 195 feet tall with the cable suspended 175 feet above-ground. The Alameda Tower would require the removal of approximately 10 trees and vegetation. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the

Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Figure 3-10 is an illustrative drawing showing the proposed improvements at Alameda Triangle. Figure 3-13 ~~2-12~~ shows the proposed location of Alameda Tower, and Figure 3-14 ~~2-13~~ shows the elevation and profile of the tower.

Figure 3-10: Proposed Improvements at Alameda Triangle

Figure 3-11 ~~2-10~~: Proposed Alameda Station Location

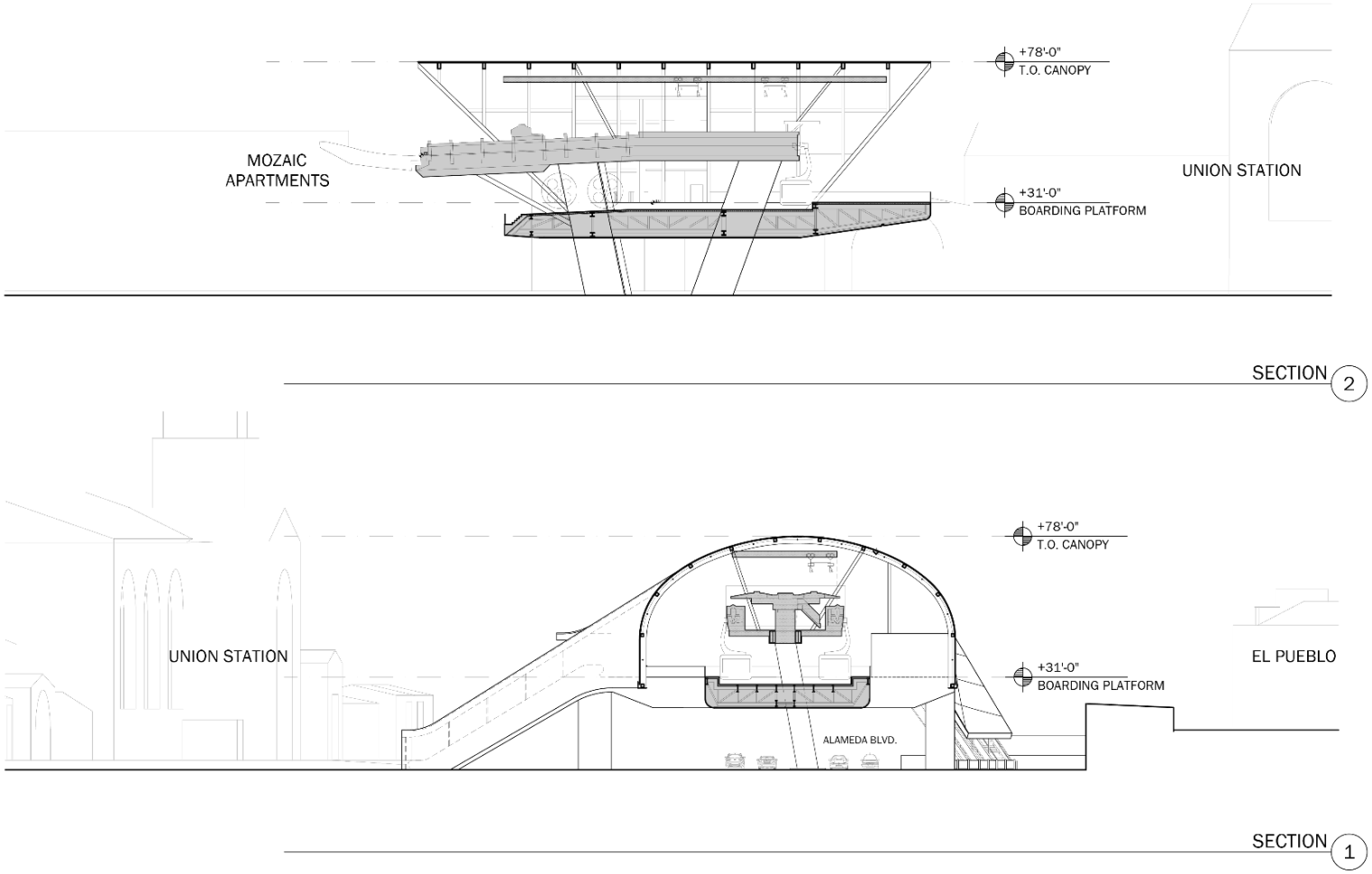


Figure 3-12 ~~2-11~~: Alameda Station Cross Sections

Figure 3-13 ~~2-12~~: Proposed Alameda Tower Location

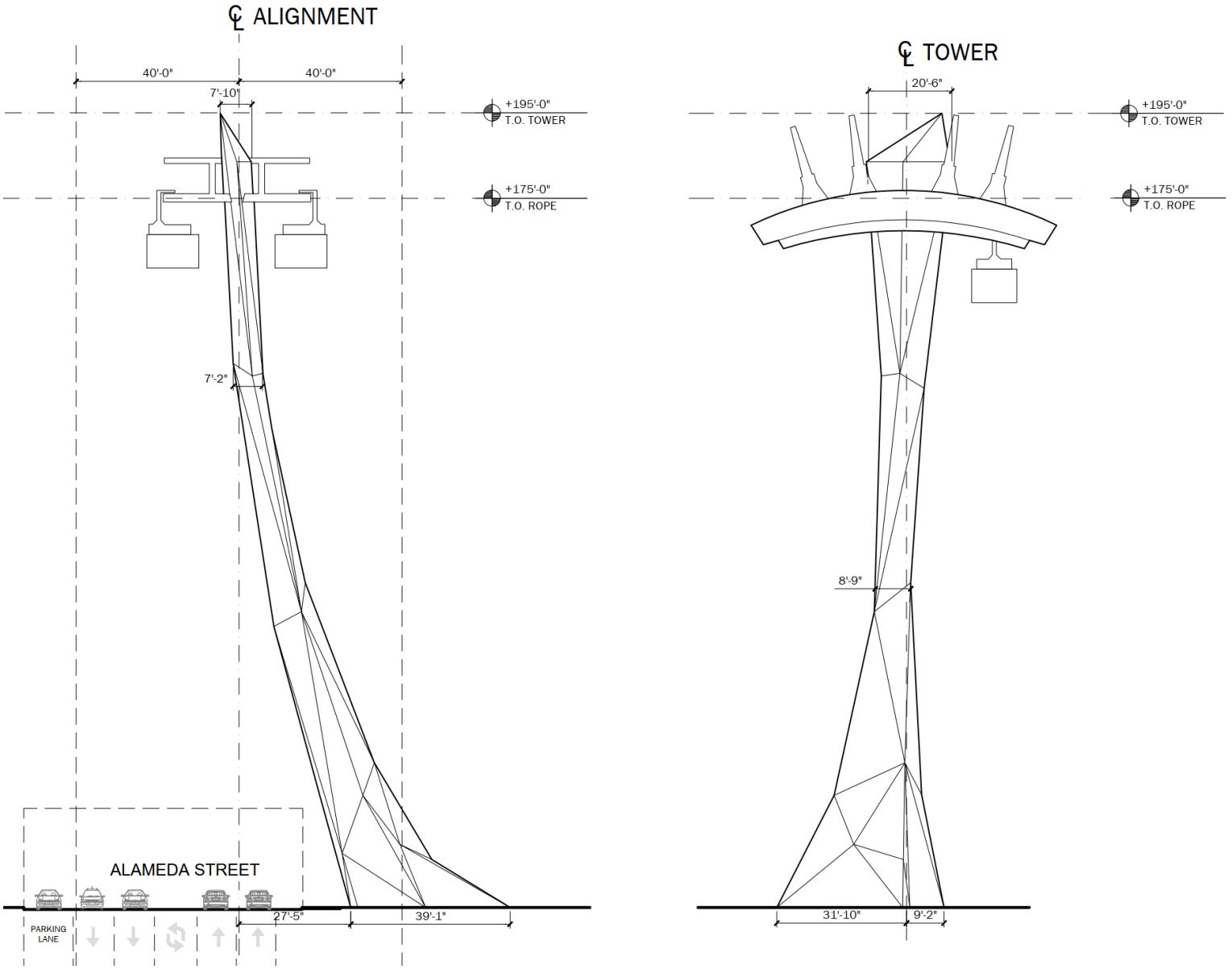


Figure 3-14 ~~2-13~~: Alameda Tower Elevations

3.5.1.3 ~~2.5.1.2~~ Alpine Tower

Alpine Tower would be located on a City-owned parcel, currently being used as non-public parking storage for City vehicles, at the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). Alpine Tower would be 195 feet tall at its tallest point, with the cable suspended 175 feet above ground. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. Figure 3-15 is an illustrative drawing showing the proposed improvements at the location of the Alpine Tower. Figure 3-19 ~~2-14~~ shows the proposed location of Alpine Tower, and Figure 3-20 ~~2-15~~ shows the elevation and profile of the tower.

Figure 3-15: Proposed Improvements at Alpine Tower

3.5.1.4 ~~2.5.1.3~~ Chinatown/State Park Station

Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. The southern portion of the station would be located on City ROW, while the northern portion of the station would be integrated into the southern boundary of the Los Angeles State Historic Park. The station would be approximately 200 feet long, 80 feet wide, and 98 feet tall at its tallest point, with the passenger boarding platform approximately 50 feet above-grade. Access to the boarding platform would be from the mezzanine via elevators and stairs. Comprised of three levels, elevators and stairs from the ground level would lead up to a mezzanine, 27 feet above-grade, and ramps for the queuing area would lead up to the boarding platform, which is 50 feet above-ground.

Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike

share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Figure 3-16 is an illustrative drawing showing the view from the Chinatown/State Park Station looking southwest from within the southern portion of the Park, showing pedestrian access enhancements, hardscape, and landscape improvements, potential seating, shade structures, and mobility hub. Figure 3-17 is an illustrative drawing looking northeast from within the southern portion of the Park, showing Park amenities including the restrooms and covered breezeway. Figure 3-18 is an illustrative drawing looking north from within the southern portion of the Park, showing Park amenities including the concession and covered breezeway. Figure 3-21 ~~2-16~~ is an illustrative drawing of the potential pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station. The Chinatown/State Park Station would require the removal of approximately 30 trees and vegetation; however, it would include the installation of landscaping and hardscaping, including integration of the granite pavers. The aerial rights requirements for the proposed Project would require the additional removal of approximately 51 trees within the Los Angeles State Historic Park; however, the proposed Project would include the installation of replacement trees. Chinatown/State Park Station would provide passenger access to Chinatown, the Los Angeles State Historic Park, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. Figure 3-22 ~~2-17~~ shows the proposed location of Chinatown/State Park Station, and Figure 3-23 ~~2-18~~ shows cross sections of the station.

Figure 3-16: Proposed Pedestrian Improvements at Chinatown/State Park Station

Figure 3-17: Proposed Park Amenities including Restrooms and Covered Breezeway

Figure 3-18: Proposed Park Amenities including Concession and Covered Breezeway

Figure 3-19 ~~2-14~~: Proposed Alpine Tower Location

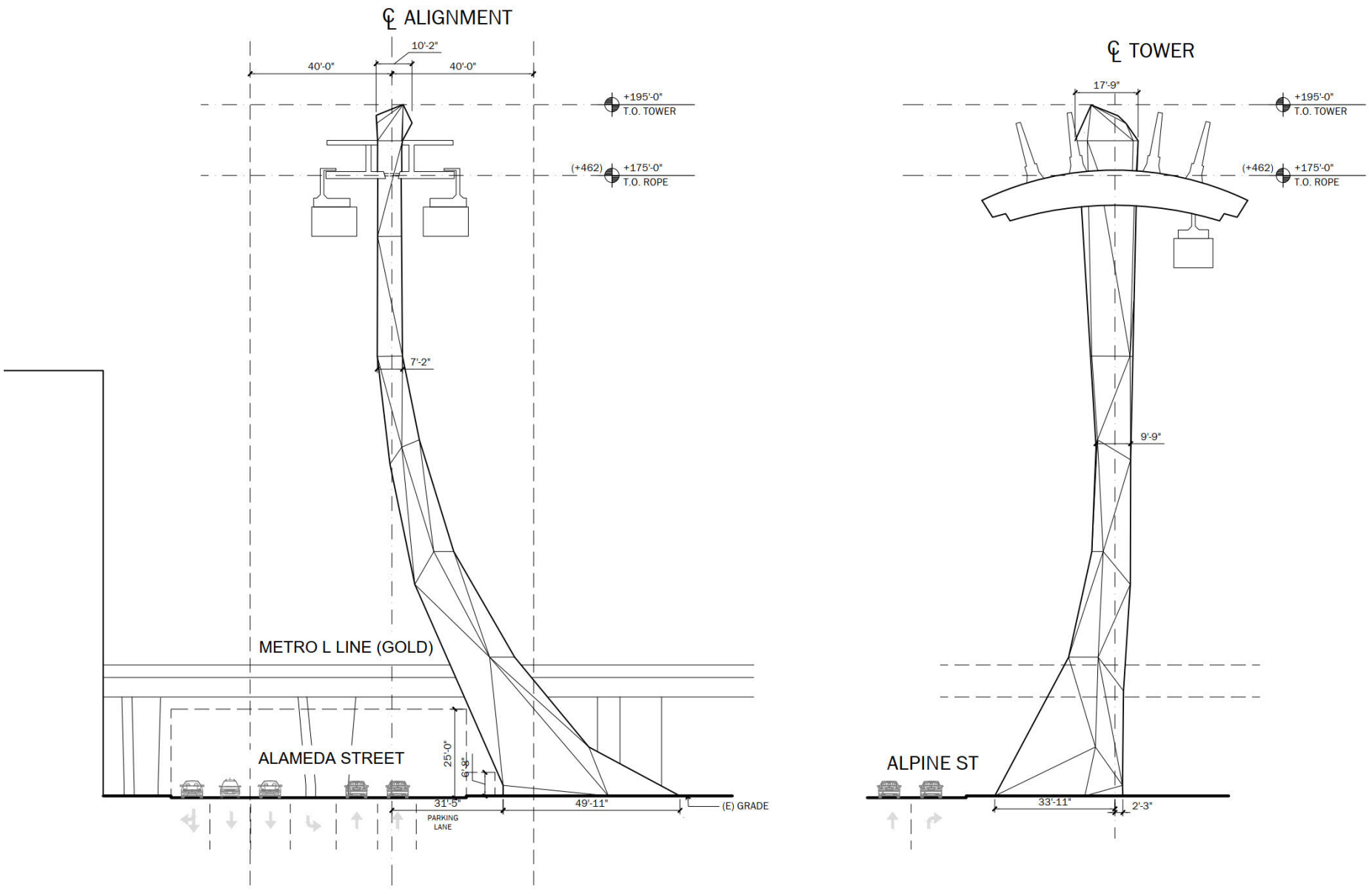


Figure 3-20 ~~2-15~~: Alpine Tower Elevations

Figure 3-21 ~~2-16~~: Illustrative Design of Pedestrian Improvements at Chinatown/State Park Station

Figure 3-22 ~~2-17~~: Proposed Chinatown/State Park Station Location

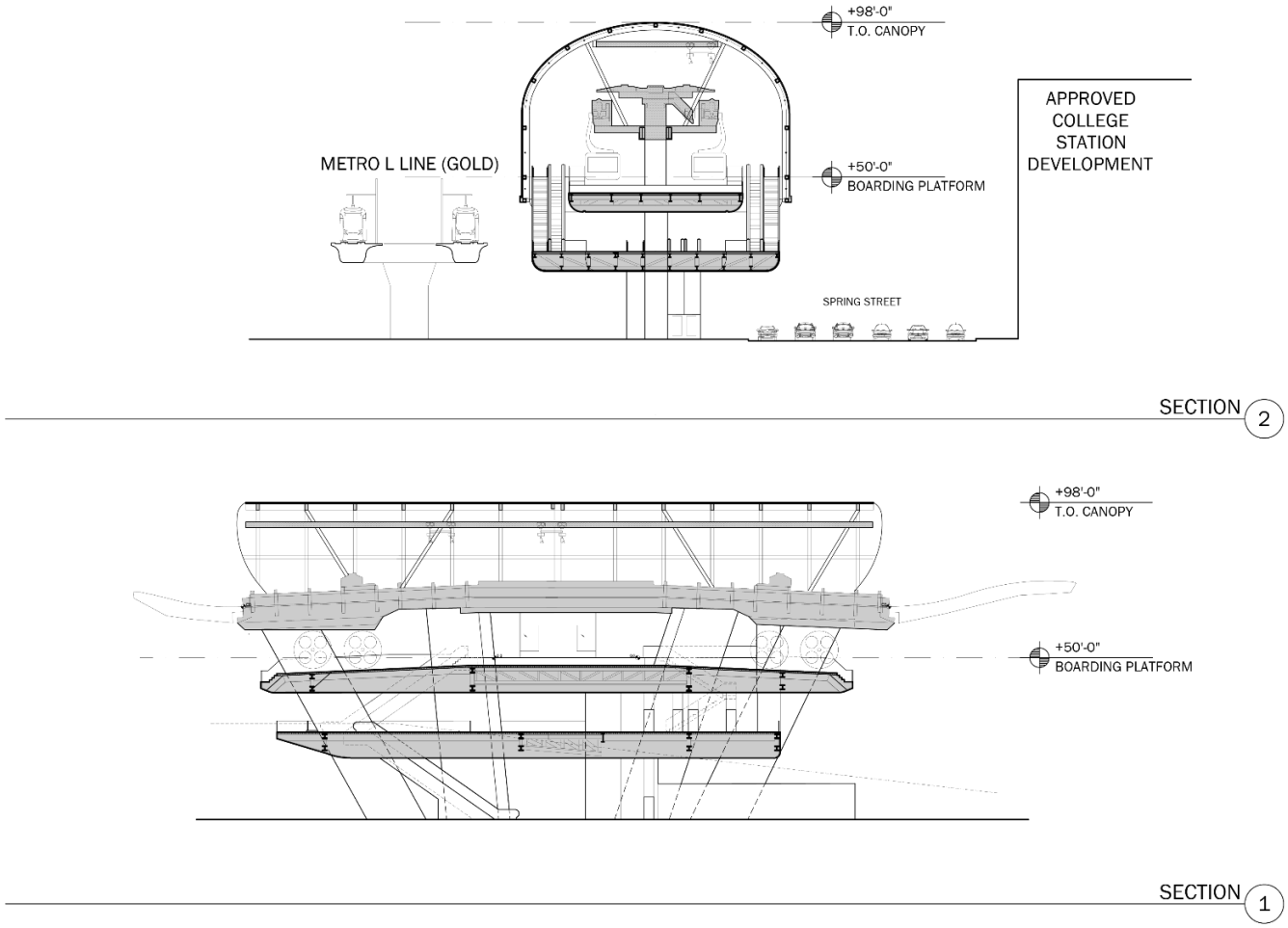


Figure 3-23 ~~2-18~~: Chinatown/State Park Station Cross Sections

3.5.1.5 ~~2.5.1.4~~ Broadway Junction

Broadway Junction is a nonpassenger junction that would be located at the intersection of North Broadway and Bishops Road. The junction would primarily be located on privately-owned property with a portion of the junction and overhead cable infrastructure cantilevered and elevated above the public ROW. The existing commercial building located at 1201 N. Broadway would be demolished. Broadway Junction would be approximately 227 feet long, 60 feet wide, and 98 feet high at its tallest point, with the platform approximately 50 feet above the ground. Vertical circulation elements (i.e., elevators and stairs) would be installed on the northwest side of the junction for staff and maintenance access to the platform. The Broadway Junction would require the removal of approximately 25 trees and vegetation. Figure 3-24 is an illustrative drawing showing the Broadway Junction. Figure 3-26 ~~2-19~~ shows the proposed location of Broadway Junction, while Figure 3-27 ~~2-20~~ shows cross sections of the junction.

Figure 3-24: Proposed Broadway Junction

3.5.1.6 ~~2.5.1.5~~ Stadium Tower

Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate and SR-110 and would stand 179 feet tall with the cable suspended 159 feet above-ground. Stadium Tower would include removal of approximately 10 trees and vegetation, however, it would include the installation of landscaping near the base of the tower. The surrounding fire buffer area around the Stadium Tower would include the removal of approximately ~~21~~ 45 significant trees and vegetation. Figure 3-25 is an illustrative drawing showing the Stadium Tower view from Arroyo Seco Parkway/SR-110 towards Downtown Los Angeles. Figure 3-28 ~~2-21~~ shows the proposed location of Stadium Tower, and Figure 3-29 ~~2-22~~ shows the elevation and profile of the tower.

Figure 3-25: Proposed Stadium Tower view from Arroyo Seco Parkway/SR-110 towards Downtown Los Angeles

3.5.1.7 ~~2.5.1.6~~ Dodger Stadium Station

Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate. This station would be approximately 194 feet long, 80 feet wide, and 74 feet high at its tallest point. Cabins at this station would arrive and depart from an at-grade boarding platform, with the passenger queuing area also at-grade. Dodger Stadium Station would include a subterranean area below the platform for storage and maintenance of cabins, as well as staff break rooms, lockers, and parts storage areas. The cabins would be transferred between the station platform and the subterranean area by way of a cabin elevator. Automated parking and controls would manage the process of storing cabins or returning them to service. Cabins would be returned to and stored at Dodger Stadium Station when the system is not in use.

Restrooms for passenger use would be located at the station. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. Figure 3-30 ~~2-23~~ is an illustrative drawing showing the pedestrian connection between Dodger Stadium Station and Dodger Stadium.

Figure 3-26 ~~2-19~~: Proposed Broadway Junction Location

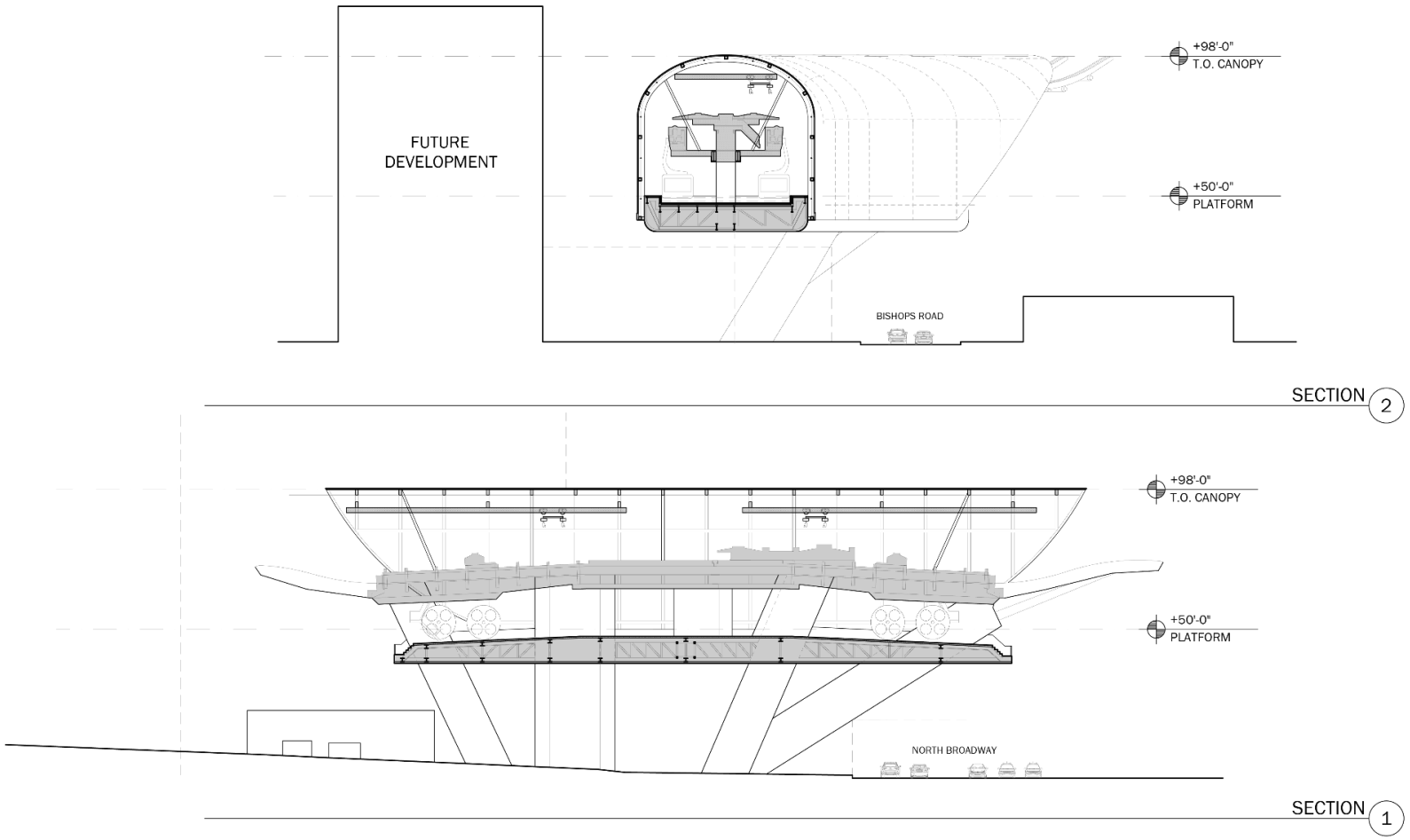


Figure 3-27 ~~2-20~~: Broadway Junction Cross Sections

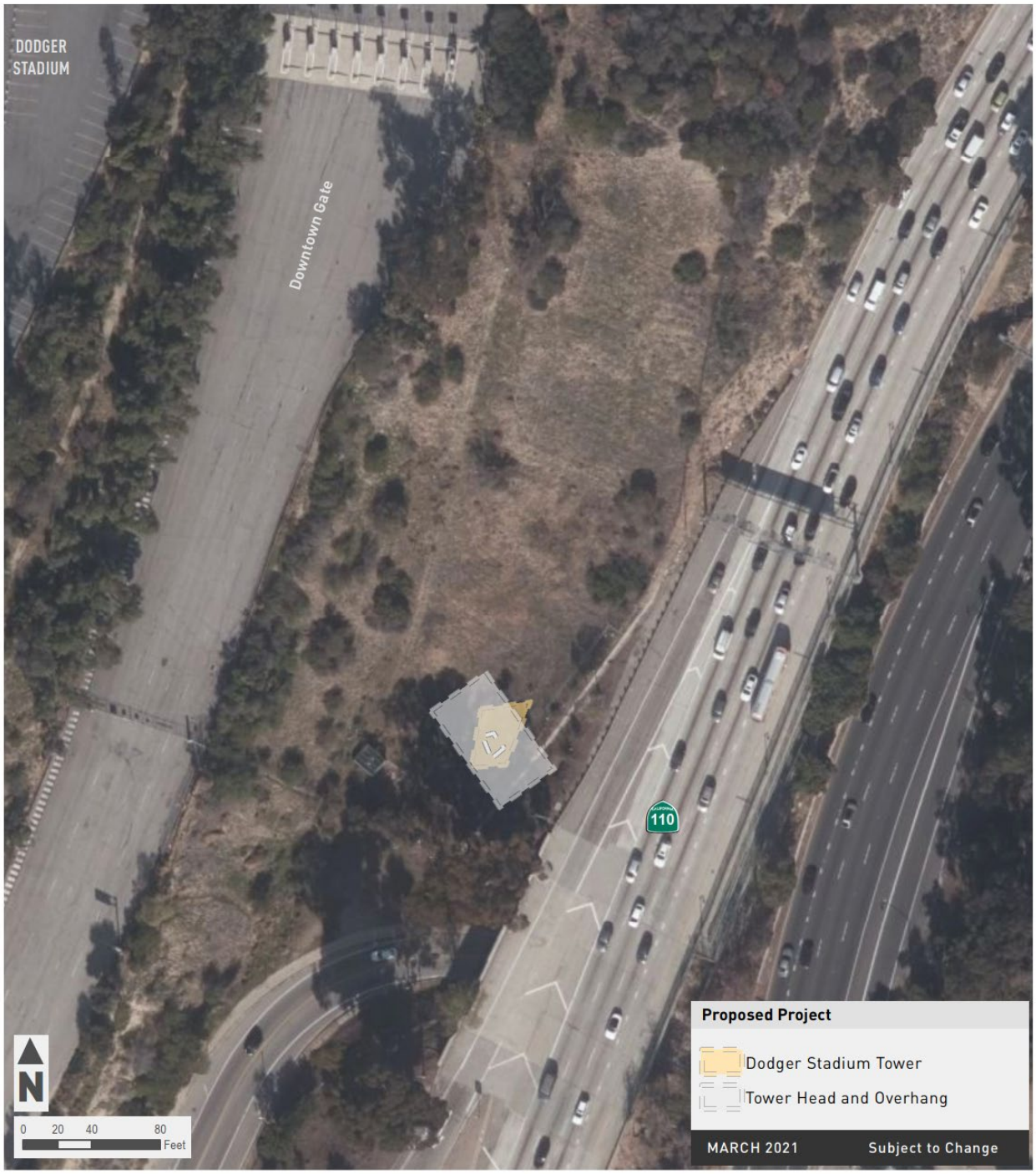


Figure 3-28 ~~2-21~~: Proposed Stadium Tower Location

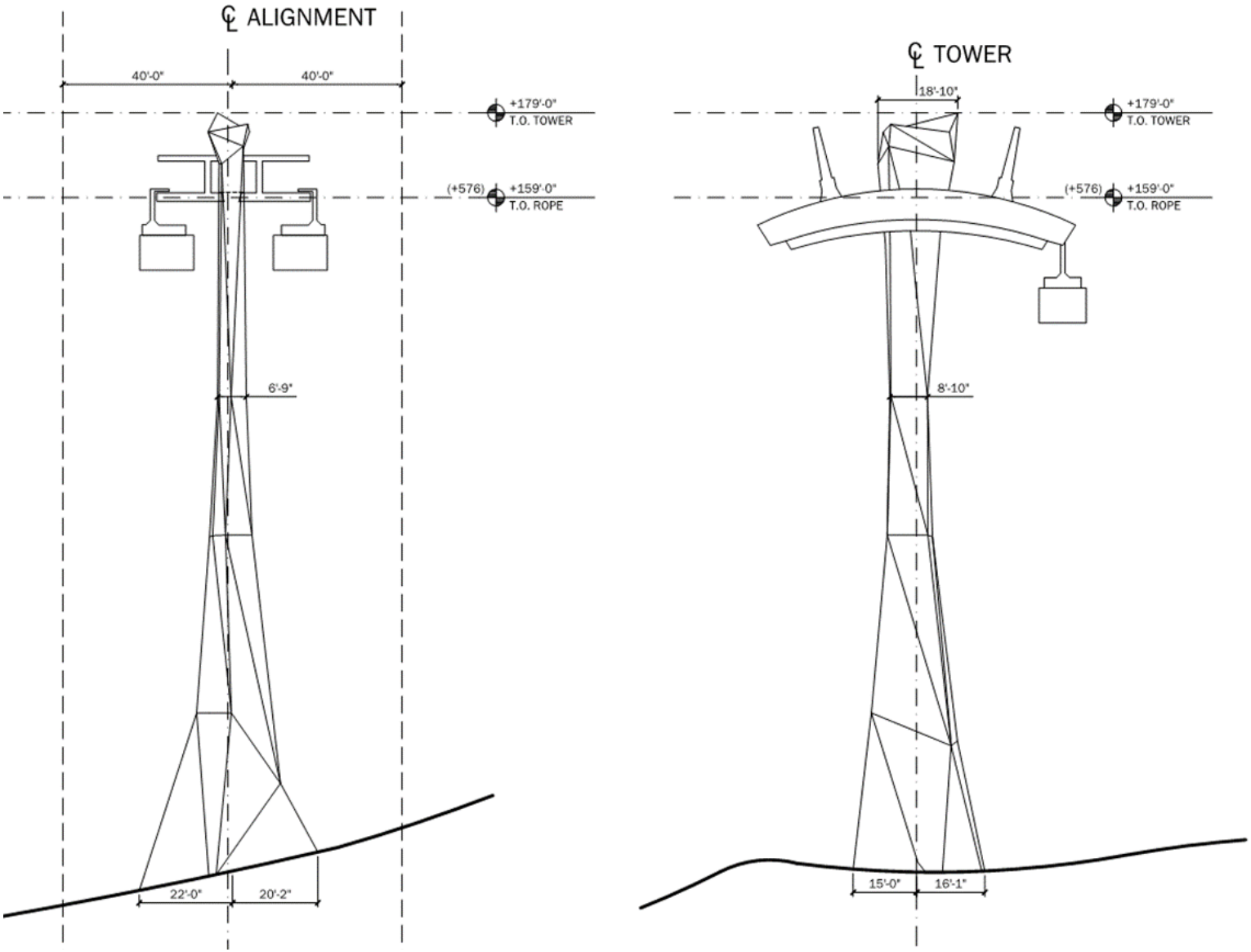


Figure 3-29 ~~2-22~~: Stadium Tower Elevations

Figure 3-30 ~~2-23~~: Illustrative Drawing of Pedestrian Connection between Dodger Stadium Station and Dodger Station

Dodger Stadium Station would be located adjacent to Dodger Stadium in a portion of the existing parking lot. The proposed Project would include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Implementation of Dodger Stadium Station would require the removal of parking spaces, as well as removal of approximately 33 trees and vegetation, however, it would include the installation of replacement landscaping. Figure 3-31 ~~2-24~~ shows the proposed location of Dodger Stadium Station, while Figure 3-32 ~~2-25~~ shows cross sections of the station.

Figure 3-31 ~~2-24~~: Proposed Dodger Stadium Station Location

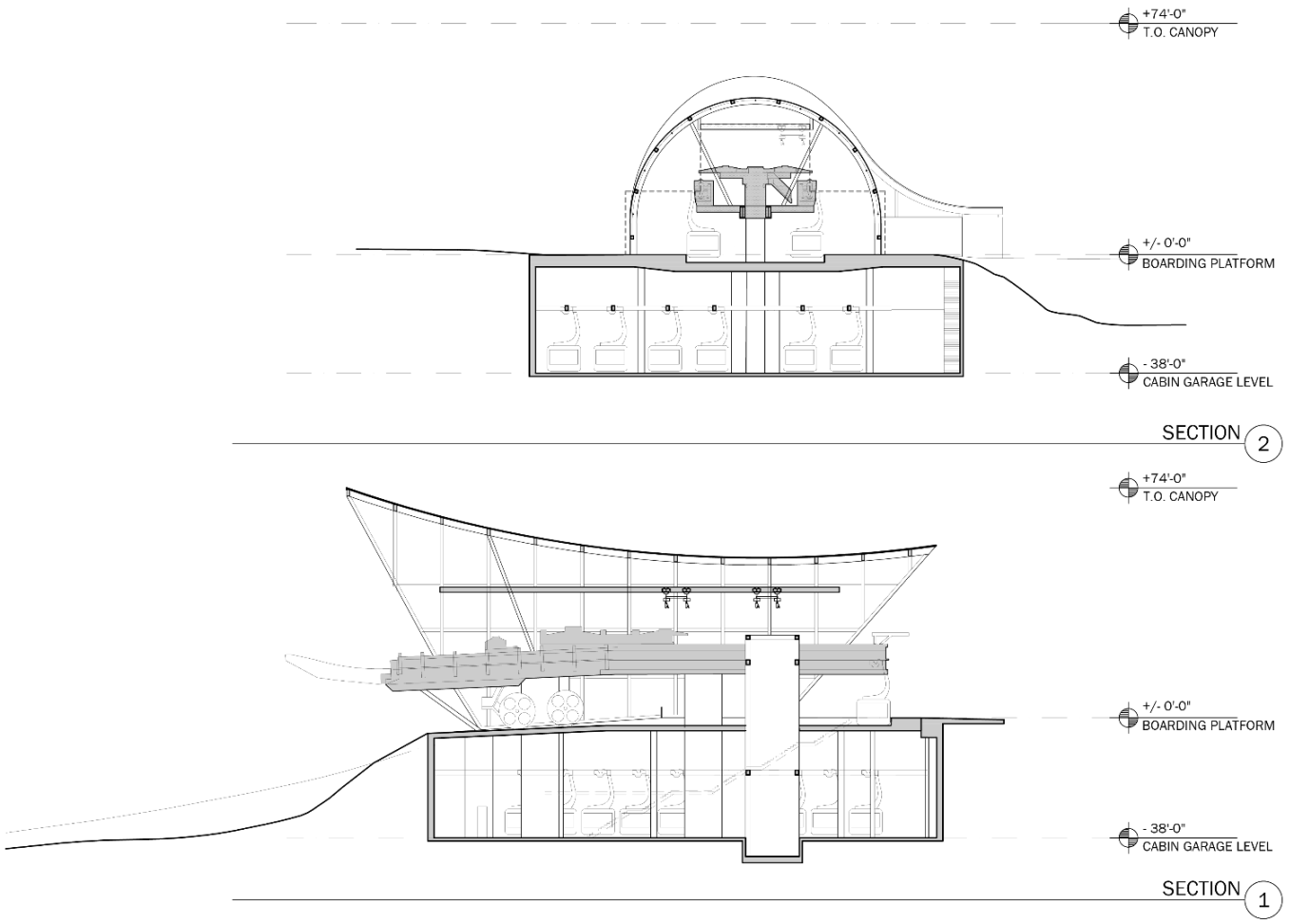


Figure 3-32 ~~2-25~~: Dodger Stadium Station Cross Sections

3.5.1.8 ~~2.5.1.7~~ Summary of Proposed Project Components

Table 3-2 ~~2-2~~ provides an overview of the station and junction components associated with the proposed Project. Table 3-3 ~~2-3~~ provides an overview of the proposed towers associated with the proposed Project.

3.6 ~~2.6~~ RIDERSHIP

The proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership. The capacity could quickly be increased or decreased to meet demand by increasing or decreasing the number of cabins on the ropeway and the speed of the haul rope. During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The cabins would move at a maximum speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins. If needed, cabins could be either slowed or stopped in the station for boarding purposes. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

The proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. Service would be to the following riders:

- Dodger game/Stadium event attendees;
- Dodger game/Stadium event employees;
- Tourists or others who want to ride ART;
- Visitors to the Los Angeles State Historic Park and Elysian Park; and
- Commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon.

The proposed Project would provide an additional transit option to riders along the proposed alignment, as it would provide a direct connection between LAUS and Chinatown and Mission Junction and Elysian Park with Chinatown/State Park Station and Dodger Stadium Station. From Dodger Stadium Station, riders could use the proposed pedestrian connections and/or mobility hub to access Elysian Park and other nearby neighborhoods, including Solano Canyon. It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand.

The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Moreover, transfers to and from the Metro regional transit system and the proposed Project would be

free. In addition, the Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). Residents and employees of businesses located within the communities adjacent to the proposed Project alignment would only pay the rate they pay to ride the Metro system. In addition, the proposed Project would be free to ride for anyone with a ticket to a Dodger game.

Table 3-2 ~~2-2~~: Proposed Project Station and Junction Details

Station Name	Location	Passenger Station	Station Size (square feet)	Canopy Size (square feet)	Height of Platform (feet above-ground)	Height of Station (feet above-ground)
Alameda Station	Alameda Street between Los Angeles Street and Cesar E. Chavez Avenue	Yes	15,279	19,217[a]	31	78
Chinatown/State Park Station[b]	Along Spring Street within the southernmost point of Los Angeles State Historic Park	Yes	22,361[c]	15,212	50	98
Broadway Junction	Intersection of North Broadway and Bishops Road	No	12,615	13,331	50	98
Dodger Stadium Station	Dodger Stadium parking lot	Yes	37,395[d]	16,001	At-Grade	74

a. The canopy size square footage for Alameda Station includes approximately 3,064 sf or canopy over the vertical circulation.
b. Chinatown/State Park Station also includes 1,419 sf of Park Amenities.
c. The station size square footage for Chinatown/State Park Station includes an approximately 8,063 sf mezzanine.
d. The station size square footage for Dodger Stadium Station includes an ~~appromately~~ approximately 24,650 sf subterranean area below the station's platform for storage and maintenance of cabins, as well as staff break rooms, lockers, and parts storage areas.

Table 3-3 ~~2-3~~: Proposed Project Tower Details

Tower Name	Location	Height to Top of Tower	Cable Height
Alameda Tower	Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue	195 feet	175 feet
Alpine Tower	Northeast corner of Alameda Street and Alpine Street on a City-owned parcel	195 feet	175 feet
Stadium Tower	Private property north of Stadium Way	179 feet	159 feet

3.7 ~~2.7~~ SYSTEM OPERATIONS

3.7.1 ~~2.7.1~~ Typical Operating Logistics

During operations, the cabins would travel on a continuous loop between Alameda Station and Dodger Stadium Station. Cabins would pass through passenger stations at roughly one foot per second (less than one mile per hour) to allow for unloading and loading. If needed, a cabin could be stopped to accommodate passenger boarding. After the cabins pass through the unload/load zones, the doors would close and the cabins would accelerate to match the line speed of the haul rope before reattaching to the haul rope.

At Alameda Station, arriving cabins (southbound) would decelerate, doors would open, and passengers would unload. The cabins would execute a U-turn in the station before passing through the load zone (for northbound passengers), load passengers (if any), close doors, then accelerate to be reattached to the haul rope.

At Chinatown/State Park Station, cabins would detach from the rope and decelerate to the station speed. Since passenger access would be provided at this station, the cabins would decelerate to about one foot per second (less than one mile per hour) and the doors would open. After traveling through the unload and load zones, the cabin doors would close, and the cabins would accelerate to line speed and then reattach to the haul rope.

At Broadway Junction, where passenger unloading or loading is not proposed, the cabins would detach from the haul rope, decelerate to a speed of approximately six mph, execute a slight turn to follow the alignment, and then re-accelerate and reattach to the haul rope. As described in Section ~~2.5.2~~ 3.5, Alameda Station to Broadway Junction and Broadway Junction to Dodger Stadium Station systems come together at Broadway Junction. When the cabins detach from the haul rope in the Junction, their move from one haul rope to the other haul rope would not be perceptible by passengers.

At Dodger Stadium Station, the cabins would decelerate, doors would open, and passengers would unload. Since Dodger Stadium Station would be an end station, the cabins would execute a U-turn in the station before passing through the load zone (for southbound passengers), load passengers (if any), close doors, then accelerate and reattach to the haul rope.

As described above, gondola cabins would enter, traverse, and depart stations under fully automated control. Operation of the proposed Project would require approximately 20 personnel. Station attendants would be located within each station to assure safe boarding or to execute stops, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would sit in a control booth and monitor screens, which would show activities in each cabin and station, as well as the system controls.

3.7.2 ~~2.7.2~~ Queueing and Ticketing/Fare Checking

Queueing areas would be built into and as necessary, adjacent to, each of the stations to provide a gathering place for passengers waiting to enter the stations, thereby preventing crowding of sidewalks and walkways by passengers around stations. Queueing for Alameda Station would occur in the planned LAUS Forecourt area on the east side of Alameda Street, and north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west side of Alameda Street. At Chinatown/State Park Station, queueing would occur on the mezzanine and boarding platform levels. At Dodger Stadium Station, the queueing area would be located on the north side of the station in a designated queueing area adjacent to the station.

Ticketing for the proposed Project would use either a chip-based card system or electronic ticketing that could be purchased and saved on a personal mobile device. Using these types of technologies would allow for contactless fare checking at the stations. Riders would pre-purchase their ticket prior to entering the boarding platform and fares would be checked using a card reader/scanner.

3.7.3 ~~2.7.3~~ Signage

Similar to other transit projects that incorporate signage, the proposed Project would include signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage. Private funding for the proposed Project is anticipated to be supported by naming rights and sponsorship revenues, and such sponsors would be recognized in Project signage, which would be designed consistent with applicable Metro, City, and State approval requirements. Such signage may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations. The digital signage would be limited to the Alameda Station and Dodger Stadium Station. Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition, directional and pedestrian signage would be placed adjacent to and throughout the proposed Project as necessary to facilitate access and safety, including along the pedestrian improvements between Metro's L Line (Gold) Station and the pedestrian connection between Dodger Stadium Station and Dodger Stadium. Project signage would be illuminated by means of low-level external lighting, internal lighting, or ambient light. Exterior lights would be directed onto signs to minimize off-site glare. Signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC), and in accordance with LAMC, lighting intensity will be minimized in order to avoid negative impacts to adjacent residential properties.

3.7.4 ~~2.7.4~~ Lighting

Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, Chinatown/State Park Station mobility hub, and Dodger Stadium Station mobility hub would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction. Lighting for the pedestrian access enhancements, including the pedestrian improvements between Metro's L Line (Gold) Station and the pedestrian connection between Dodger Stadium Station and Dodger Stadium, would include new pole lights for security and wayfinding purposes, as well as low-level lighting to accent signage and landscaping.

Lighting would be low-level and primarily integrated within the architectural features. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable LAMC lighting standards. The lighting would also meet all applicable safety standards.

3.7.5 ~~2.7.5~~ Maintenance

The proposed Project would require routine maintenance that would be performed by the system operator. The overall system would be observed on a daily basis as part of the startup routine.

Routine maintenance activities would generally take place during overnight periods or other scheduled down time. Cabins and their associated grips and hangers would be maintained in the shop at Dodger Stadium Station. A work carrier cabin would be provided to facilitate work at tower equipment. Annual maintenance activities may require crane access at tower locations, including the potential to require the temporary closing of traffic lanes.

Rope maintenance schedules would be determined through a combination of system design and periodic monitoring. The haul rope would need replacement approximately every five to 10 years. This would require pulling a new haul rope, which would take up to two weeks to complete.

On a periodic basis, the system would undergo formal testing as prescribed by Cal/OSHA and appropriate ropeway standards. This formal testing is required by standards to occur at least every seven years. It is anticipated that the system would be closed to riders for up to two days during the formal testing events.

Backup power would be provided by battery storage located at each station and tower and the non-passenger junction. The battery storage system would be tested on a regular basis and would provide backup power to allow unloading of the system in the event of a power grid failure.

3.7.6 ~~2.7.6~~ Safety Systems and Ancillary Elements

The proposed Project would be designed to minimize operational disruptions resulting from equipment issues, which are often predictable and avoidable. The proposed Project would focus on avoiding such issues through preventative maintenance and by including redundant equipment.

Operational disruptions resulting from equipment issues would be minimized through robust design and periodic and preventative maintenance. Robust design is an approach where, after the design requirements are engineered, extra design factors are incorporated into the system. Information from other modern urban aerial rapid transit systems as well as the operating history of this system would be taken into account to schedule preventative and periodic maintenance. Combining experience from other systems with historical data from this system's operation would provide an evolving and robust maintenance program. The documentation would reflect daily, weekly, monthly and annual activities. Daily activities would largely focus on inspections to verify normal operation of components prior to public operations. Longer-term activities would generally focus on maintaining, replacing, or rebuilding components. Maintenance recommendations including inspection procedures and scheduled activities are required to be provided by the equipment provider. Compliance with those recommendations is required by Cal/OSHA, the authority responsible for regulating passenger ropeways in California.

To account for the possibility of potential mechanical issues that could potentially interrupt operations, the system would design and implement redundancies. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload passengers from the system. Additional redundancies could include elements such as bullwheels, brakes, and conveyors.

3.7.7 ~~2.7.7~~ Emergency Operations Plan

Safety and emergency procedures would be separated into two types: personal events and equipment events. As described in Section 3.7.6 ~~2.7.7~~, the proposed Project would be designed to minimize service interruptions resulting from either type of event.

For personal events, such as a medical situation, operators would have the ability to contact local security, law enforcement or other emergency response agencies. In addition to attendants at each station, the system would include video surveillance and audio communications in each station and in each cabin. These features would allow for control room operators to see and communicate with passengers at any point in their trip. The most common passenger need would be assistance with loading or unloading, which the attendant can resolve. The combination of staff and surveillance would allow operators to respond to events as appropriate. Security and response procedures for the larger crowds on event days would be established and followed.

In stations, the video surveillance would also serve to provide equipment monitoring. By observing operations from the control room, the equipment monitoring could allow for faster resolution of any system alarms or faults and may facilitate identification of unscheduled maintenance needs. Video surveillance at towers would be primarily for the purpose of equipment monitoring and diagnosis.

An Emergency Operations Plan would be prepared as part of the proposed Project and would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD). The plan would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan will include communication protocols with local authorities for further instruction and coordination.

The plan would also address the unlikely scenario where the system cannot be moved to unload passengers normally at stations. As noted above, the robust design, periodic and preventative maintenance, and equipment redundancies are intended to minimize this scenario. However, the plan would include procedures to evacuate passengers directly from cabins, if needed. Such an evacuation would involve emergency response services and would use specialized equipment such as ladder trucks, bucket trucks, or descending devices. An Evacuation Plan would be developed as part of the Emergency Operations Plan as required by industry standard ANSI B77.1 and Cal/OSHA regulations, to describe the preferred methods of evacuation based on the location of cabins, environmental conditions, and unusual terrain. The Evacuation Plan would include the required equipment and procedures for evacuation, site control, and passenger communications. Analysis and coordinated practice of the evacuation modes would be performed in advance of opening the system. The Evacuation Plan would document the procedures, equipment and personnel necessary to evacuate the system, as well as provide for documenting of training and practice. Such analysis, practice, and documentation are required by Cal/OSHA.

System components would be equipped with security features to ensure system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or

entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers will be secured at all times and only accessible by authorized personnel. The system components will be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin.

3.7.8 ~~2.7.8~~ Power Requirements

Operational power requirements can be separated into two categories: normal operations and emergency operations. Power requirements for the proposed Project would be provided by the City of Los Angeles Department of Water and Power's (LADWP) Green Power Program, through a connection to their power grid, and would include the power to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). When operating at capacity, normal operations are estimated to require a total of approximately 2.5 megawatts of power.

Power for the cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment

Power requirements for emergency operations consist of the energy needed for operations in the event of a power grid failure. The proposed Project would include the installation of backup battery storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event of a power grid failure. The total backup power required to allow unloading of the system is 1.4 megawatts.

3.7.9 ~~2.7.9~~ Sustainability Features

The proposed Project would provide a sustainable, high-capacity zero emission ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. ART technology is quiet, and the proposed Project would reduce VMT and congestion, leading to reduced GHG emissions and improved air quality.

The proposed Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features, as feasible. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers.

The design intent and structural strategy for the stations and towers also provides an efficiency of materials. The steel plate tower forms have been designed as "Monocoque" structures, where structure, form, and finish are unified. Materials for the stations, junction, and towers would be locally sourced where possible, and would include recycled content where possible. Light-toned finish materials will also serve to minimize heat island concerns.

The proposed Project would be designed to comply with all applicable state and local codes, including the City of Los Angeles Green Building and Low-Impact Development (LID) Ordinances.

A comprehensive list of the proposed Project's sustainability features would include the following, which was compiled from features included in the 2019 California Green Building Standards Code, United States Green Building Council Leadership in Energy and Environmental Design (LEED) for New Construction, and The Institute for Sustainable Infrastructure's Envision Rating System.[27,28,29]

(1) Location/Transportation/Quality of Life

- Encourage use of alternative modes of transportation.
- Provide transit connection from the regional transit system accessible at LAUS to Dodger Stadium.
- Provide opportunity to improve transit to underserved neighborhoods and uses along the alignment, including Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon.
- Provide opportunity to improve access to parks and green space.
- Reduce vehicle trips to Dodger Stadium, Elysian Park, and the Los Angeles State Historic Park.
- Reduce transportation related pollution and GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- Provide a mobility hub at Chinatown/State Park Station and a ~~potential~~ mobility hub at the Dodger Stadium property to support mobility connectivity with the State Park and Elysian Park and surrounding communities, respectively.
- Utilize 3S gondola system to minimize noise and vibration.

(2) Sustainable Sites

- Generally located the proposed Project within public ROW, publicly owned property or on previously developed sites.
- Avoid utilization of greenfield sites and destruction of prime habitat, thereby avoiding destruction of biodiversity.
- Site, design, and construct stations, the junction, and towers to minimize impacts to historic and archaeological resources, and to preserve viewsheds and local character.
- Provide opportunity to enhance open space and green space at the Los Angeles State Historic Park and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.
- Design proposed Project to comply with the City's LID Ordinance, when applicable.
- Select landscape planting palettes and species to be climate appropriate (drought tolerant), non-invasive, and to not require excessive pesticides and fertilizers.
- Design site development on slopes (Stadium Tower and Dodger Stadium Station) to avoid excessive erosion and landslides.

[27] 2019 California Green Building Standards Code~~,~~. 2019. A~~a~~vailable at: https://calgreenenergyservices.com/wp/wp-content/uploads/2019_california_green_code.pdf. Accessed November 2023.

[28] United States Green Building Council Leadership in Energy and Environmental Design for New Construction v4.1~~,~~ A~~a~~vailable at: https://www.usgbc.org/leed/v41. Accessed November 2023.

[29] The Institute for Sustainable Infrastructure~~'s~~. Envision Rating System~~,~~. A~~a~~vailable at: https://sustainableinfrastructure.org/envision/use-envision/. Accessed November 2023.

- Select station, junction, and towers and hardscape materials to reduce Solar Reflective Index values to minimize heat island effect.
- Select lighting to comply with applicable requirements of the Los Angeles Municipal Code, CALGreen, and the California Motor Vehicle Code, so the proposed Project would not create a new source of light trespass or glare.

(3) Water Efficiency

- Design landscape planting to utilize drought tolerant plant palettes and low water use irrigation strategies.
- Utilize municipal reclaimed water sources for irrigation where available and practical.
- Utilize low flow plumbing fixtures and metered faucets in restrooms.

(4) Energy Conservation

- Design open-air station boarding platforms with natural shading and ventilation; air conditioned spaces occur only at cabins, maintenance support spaces, and restrooms.
- Provide energy efficient LED or low voltage lighting fixtures.
- Include energy efficient glazing, where it occurs.
- Utilize Los Angeles Department of Water and Power green power sources.
- Provide backup power by battery storage as opposed to diesel generators.

(5) Materials and Resources

- Sell and/or reuse or recycle more than 62,600 cubic yards of approximately 78,500 cubic yards of construction waste for backfill.
- Utilize a waste management policy for system construction and operations to reduce volume of waste to landfills.
- Use materials that are renewable, locally sourced, and/or have recycled content where practical for system construction and operations.

(6) Indoor Environmental Quality

- Design open air station boarding platforms, allowing for natural ventilation and natural daylighting.
- Design mechanically ventilated spaces to comply with ANSI/ASHRAE 62.1 recognized standard for ventilation and indoor air quality and Title-24 residential ventilation requirements standards.
- Utilize enhanced ventilation rates to improve occupant comfort and health.
- Prohibit smoking inside common areas of buildings, and within 25 feet of building entries.
- Specify low VOC products for all finishes.
- Implement an indoor air quality management plan for enclosed spaces during construction.
- Install new filtration media in the HVAC system and perform building flush-out prior to occupation of enclosed spaces.
- Provide individual lighting controls for enclosed spaces where practical.

3.8 ~~2.8~~ CONSTRUCTION

Construction of the proposed Project is anticipated to begin as early as 2024 and take approximately 25 months, including construction, cable installation, and system testing. The detailed construction procedures informing the environmental impact analyses are included in *Construction Assumptions* (Appendix B) to this EIR. A summary of the construction activities is provided below. Construction of the Project components may partially overlap in schedule, especially since construction would occur at several physically separated sites.

Utility relocations would occur prior to construction of the proposed Project components and would be coordinated directly with the utility providers. Following utility relocations, construction would commence. Detailed information on utilities relocations is included in *Construction Assumptions* (Appendix B) to this EIR.

During construction, some parking spaces at Dodger Stadium would be temporarily closed for construction of the Dodger Stadium Station and for overall Project construction trailers, laydown and staging areas, and construction worker parking.

Construction of more than one Project component would occur at the same time, with consideration of available materials, work crew availability, and coordination of roadway closures. Table 3-4 ~~2-4~~ below includes the estimated duration to complete construction of each of the proposed Project components, the maximum depths of drilled piles, the maximum depth of excavation, the amount of excavation, and the amount of materials (soils and demolition debris) to be exported for each component of the proposed Project.

Table 3-4 ~~2-4~~: Proposed Project Construction Details

Component	Construction Duration	Maximum Construction Area	Maximum Depth of Drilled Piles	Maximum Depth of Excavation	Amount of Excavation	Amount of Materials Exported
Alameda Station	17 months	55,600 sq. ft.	125 feet	10 feet	2,728 cubic yards	2,295 cubic yards
Alameda Tower	12 months	40,600 sq. ft.	120 feet	10 feet	2,850 cubic yards	2,292 cubic yards
Alpine Tower	11 months	38,700 sq. ft.	120 feet	10 feet	3,606 cubic yards	2,887 cubic yards
Chinatown/ State Park Station	19 months	69,000 sq. ft.	80 feet	10 feet	6,267 cubic yards	4,567 cubic yards
Broadway Junction	19 months	65,000 sq. ft.	120 feet	7 feet	6,407 cubic yards	5,379 cubic yards
Stadium Tower	12 months	23,500 sq. ft.	120 feet	7 feet	1,286 cubic yards	1,202 cubic yards
Dodger Stadium Station	20 months	142,600 sq. ft.	55 feet	42 feet	44,313 cubic yards	44,001 cubic yards

Following completion of construction, the gondola cables would be installed, followed by system testing and inspections.

Working hours would vary to meet special circumstances and restrictions, but are anticipated to be consistent with the City's allowable construction hours of Monday through Friday between 7:00 a.m. to 9:00 p.m. and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m. While not anticipated,

approval would be required from the City of Los Angeles Board of Police Commissioners for any extended construction hours and possible construction on Sundays.

Anticipated closures would include lane closures in which lanes would be closed 24-hours a day during certain phases of construction, or alternating closures during certain phases of construction, in which closures would occur during construction hours for approximately 10 hours a day, and roads would reopen during non-construction hours for approximately 14 hours a day. For alternating closures, during non-construction hours, steel plates would be placed over construction sites to the extent feasible in order to allow for vehicular and pedestrian circulation. The closures and hours would vary between location and phase of construction. The proposed Project would implement a Construction Traffic Management Plan that would include detours and ensure that emergency access is maintained throughout all construction activities.

3.9 ~~2.9~~ PROJECT BUILDOUT

Once constructed, the proposed Project would result in permanent changes to roadways at some locations due to the installation of the stations, junction, and towers within the public ROW. Circulation in the areas around the stations and towers is described below. Figures 3-33 ~~2-26~~ through 3-39 ~~2-32~~ depict the proposed Project after buildout.

3.9.1 ~~2.9.1~~ Alameda Station

Following construction of Alameda Station, circulation on Alameda Street between Cesar E. Chavez Avenue and Los Angeles Street would be similar to existing conditions with the exception of a new raised median introduced within the left-turn pocket on Alameda Street, as shown in Figure 3-33 ~~2-26~~. The station columns and vertical circulation elements within City ROW would have a footprint of 800 square feet, and the station canopy would have an overhang of 17,180 square feet over City ROW. The escalators and queueing area for the station would be located to the east within an existing LAUS parking lot, and to the west north of the Placita de Dolores of El Pueblo de Los Angeles. The placement of the escalators and queueing on the east side of the station would be designed to accommodate the future development of the planned LAUS Forecourt and Esplanade Improvements Project. The vertical circulation would have a footprint of 1,180 square feet within the planned Forecourt, and the station canopy would have an overhang of 2,040 square feet over the planned Forecourt.

In terms of roadway configuration, and in consideration of the planned Alameda Esplanade project occurring along Alameda Street, Alameda Street would maintain two northbound through lanes, two southbound through lanes, one northbound through-right-turn lane, one northbound left-turn lane, and one southbound left-turn lane.

3.9.2 ~~2.9.2~~ Alameda Tower

Following construction of Alameda Tower, Alameda Street between North Main Street and Alhambra Avenue would be similar to existing conditions with the exception of a new curb extension introduced along the eastern edge of Alameda Street in the vicinity of the tower, which would reduce existing parallel parking by six spaces, as shown in Figure 3-34 ~~2-27~~. The tower would have a footprint of 900 square feet within Alameda Triangle, a City ROW.

In terms of roadway configuration, Alameda Street would maintain two northbound through lanes, three southbound through lanes, and one northbound left-turn lane.

3.9.3 ~~2.9.3~~ Alpine Tower

Following construction of Alpine Tower, Alameda Street at its intersection with Alpine Street would be similar to existing conditions, as shown in Figure 3-35 ~~2-28~~. The tower would have a footprint of 1,030 square feet within a City-owned parcel.

In terms of roadway configuration, Alameda Street would maintain two northbound through lanes, one southbound left-turn lane, two southbound through lanes, one southbound through-right lane, and one northbound left-turn lane. Alpine Street would maintain two westbound through lanes, two eastbound through lanes, one westbound left-turn lane, and one westbound right-turn lane.

3.9.4 ~~2.9.4~~ Chinatown/State Park Station

Following construction of Chinatown/State Park Station, Spring Street at the southern end of the Los Angeles State Historic Park would be similar to existing conditions, as shown in Figure 3-36 ~~2-29~~. The station would have a footprint of 2,605 square feet, comprised of 410 square feet located on City ROW and 2,195 square feet in the park. The station canopy would have an overhang of 15,030 square feet, comprised of 5,710 square feet over City ROW and 9,320 square feet over the park. The proposed Project's required aerial clearance width over the Los Angeles State Historic Park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, plus an Additional Separation Buffer. The aerial clearance would allow the continued use of the park, with certain limitations.

In terms of roadway configuration, Spring Street would maintain two northbound through lanes with a parallel parking lane, two southbound through lanes with a parallel parking lane, and a two-way left turn lane.

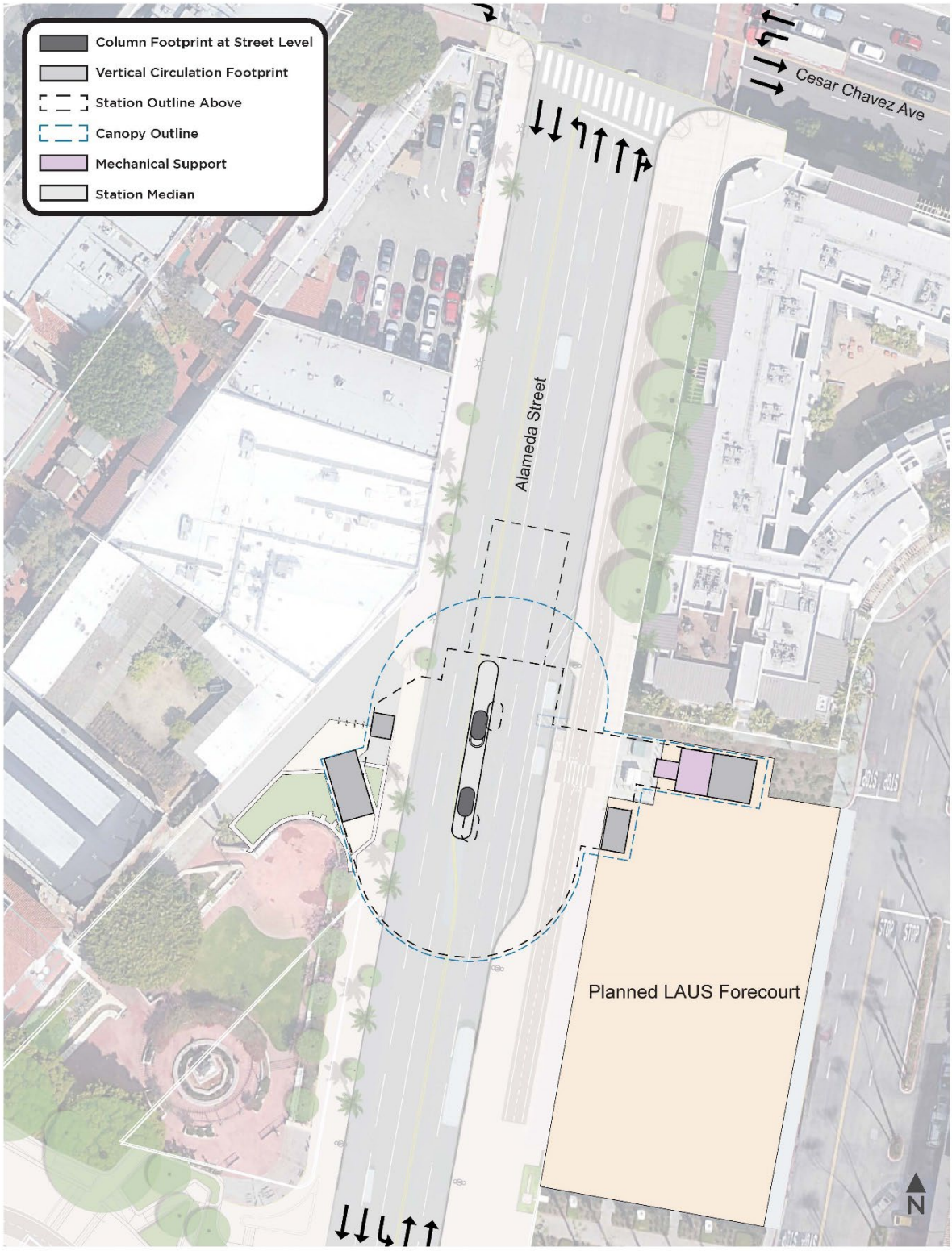


Figure 3-33 ~~2-26~~: Alameda Station Buildout Conditions

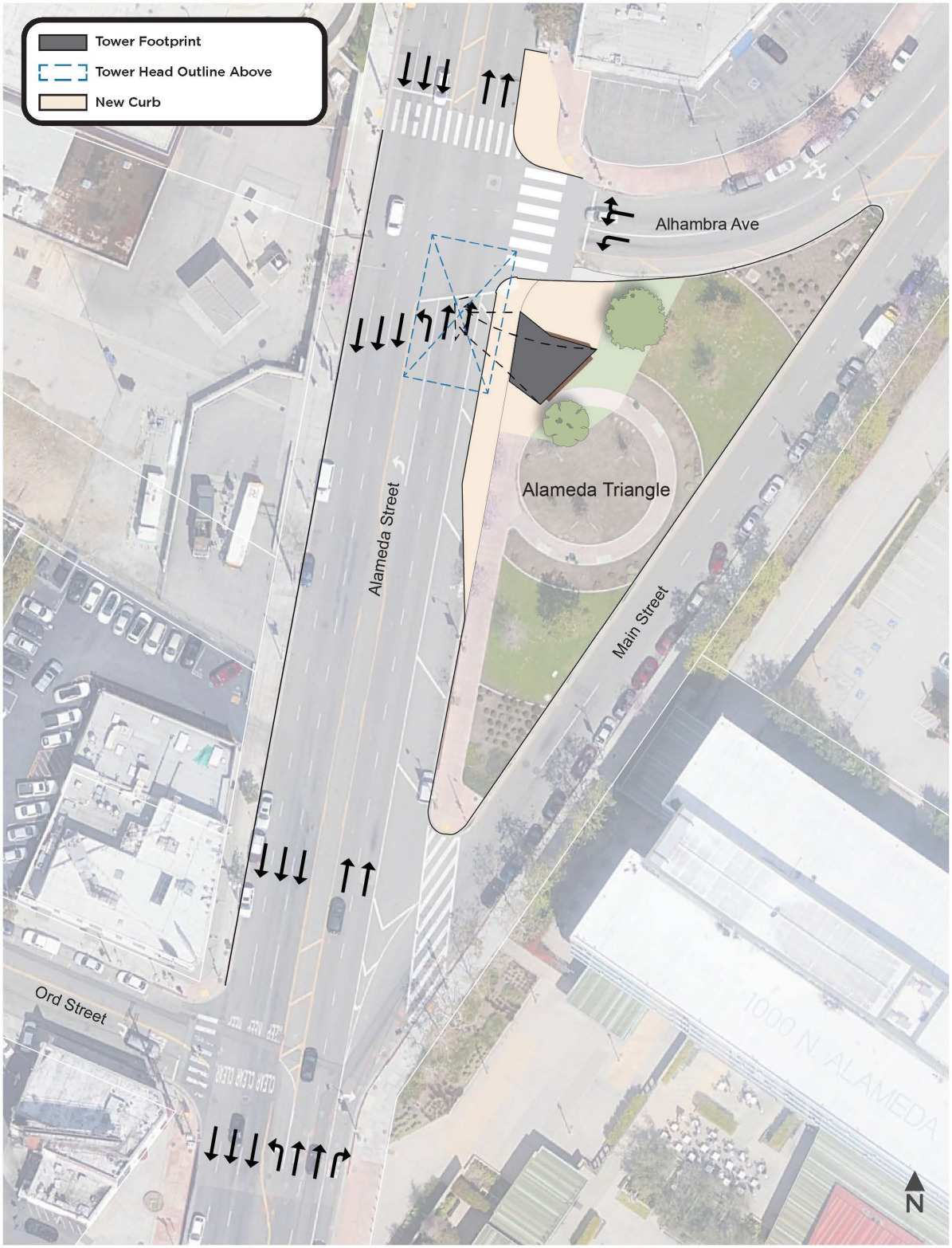


Figure 3-34 ~~2-27~~: Alameda Tower Buildout Conditions

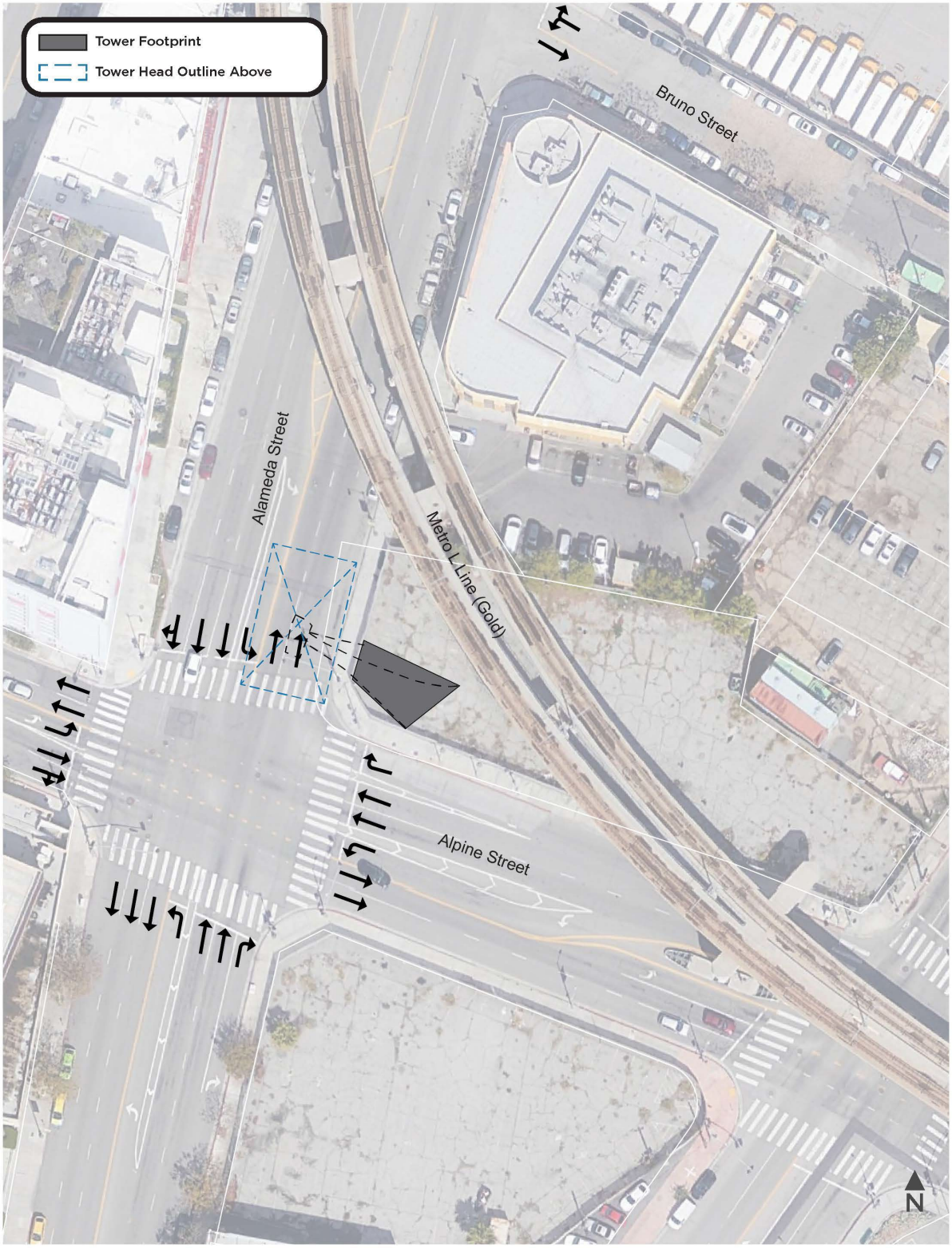


Figure 3-35 ~~2-28~~: Alpine Tower Buildout Conditions

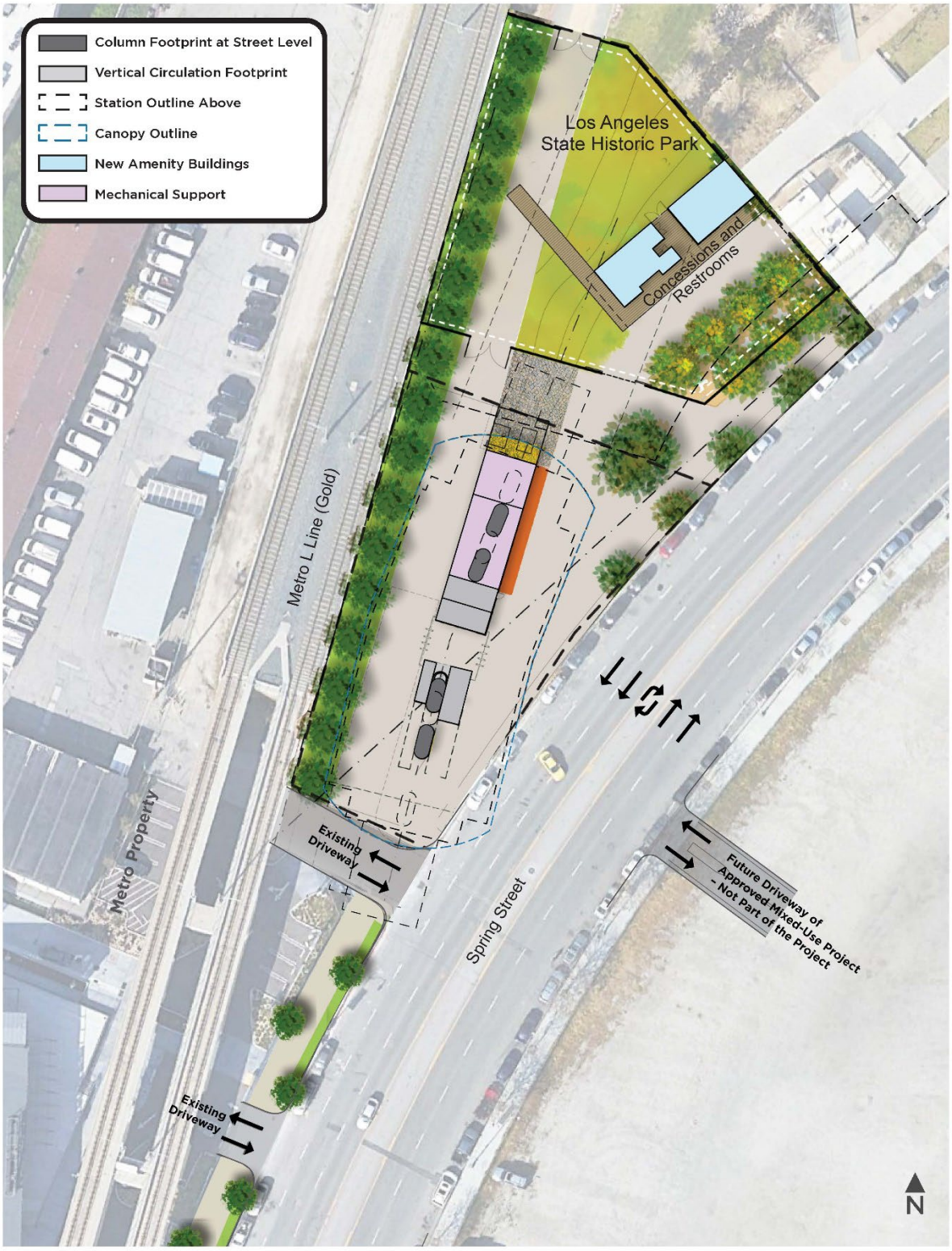


Figure 3-36 ~~2-29~~: Chinatown/State Park Station Buildout Conditions

3.9.5 ~~2.9.5~~ Broadway Junction

Following construction of Broadway Junction, buildout conditions would be similar to existing conditions except that the junction would be cantilevered over the intersection of North Broadway and Bishops Road, as shown in Figure 3-37 ~~2-30~~. The junction would have a footprint of 1,460 square feet on privately-owned property. The junction canopy would have an overhang of 13,350 square feet.

In terms of roadway configuration, North Broadway would maintain two northbound through lanes, one southbound through lane, one southbound through-right lane, and one northbound left-turn lane. Bishops Road would maintain one westbound through lane and one eastbound shared left-/right-turn lane.

3.9.6 ~~2.9.6~~ Stadium Tower

Following construction, Stadium Tower would be located completely within the hillside area near Dodger Stadium, as shown in Figure 3-38 ~~2-31~~. The tower would have a footprint of 870 square feet within a privately-owned property. No changes to roadway configurations would occur.

3.9.7 ~~2.9.7~~ Dodger Stadium Station

Minor changes would occur in the parking lot where Dodger Stadium Station would be located, as shown in Figure 3-39 ~~2-32~~. After completion of construction, the stadium perimeter road would be slightly realigned around Dodger Stadium Station. Approximately 194 existing parking spaces would be removed to accommodate the station, the realigned perimeter road, and the pedestrian pathway connecting the station and Dodger Stadium. Additionally, a new access driveway would be constructed into the hillside from the existing access road below to provide direct access to the basement level of the station for maintenance personnel. The station would have a footprint of 27,770 square feet, of which the station canopy would have an overhang of 16,020 square feet.

Figure 3-37 ~~2-30~~: Broadway Junction Buildout Conditions

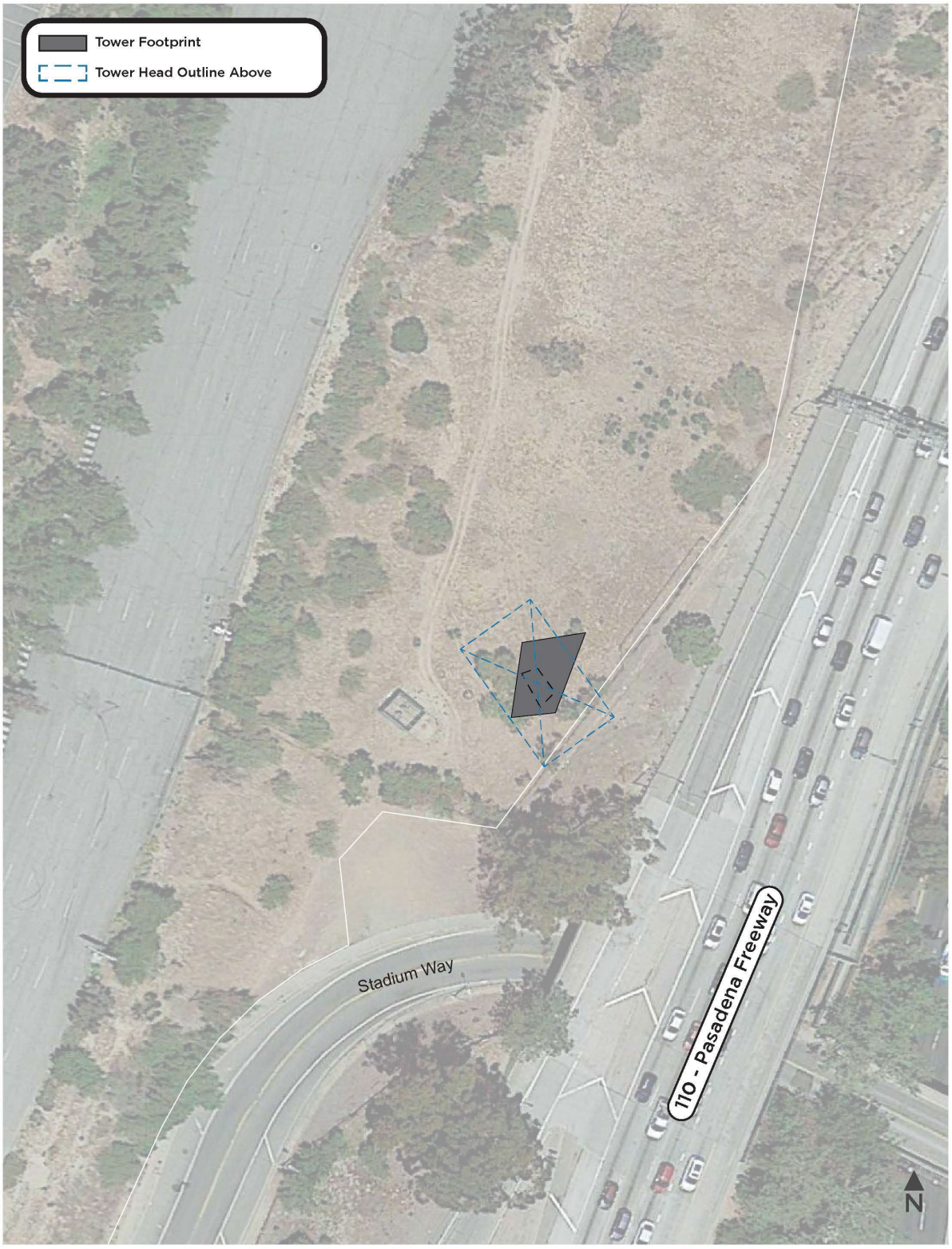


Figure 3-38 ~~2-31~~: Stadium Tower Buildout Condition

Figure 3-39 ~~2-32~~: Dodger Stadium Station Buildout Conditions

3.10 ~~2.10~~ REQUIRED PERMITS AND APPROVALS

The Project EIR will provide environmental clearance as needed for all of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project including, but not necessarily limited to, the following:

California Department of Transportation (Caltrans)

1. Pursuant to the California Streets and Highways Code section 660, approval from Caltrans through an encroachment permit and/or other agreement, form of permission, or approval(s) to access, construct, and/or operate the Project within/over the State transportation system right-of-way.

California State Parks

2. Approvals determined necessary by the California Department of Parks and Recreation for the Project could include, but not necessarily be limited to:
    a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.
    b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.
    c. Pursuant to Public Resources Code Section 5003 and Government Code Section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.
    d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

California Division of Occupational Safety and Health (Cal/OSHA)

3. Pursuant to Title 8, California Code of Regulations sections 3150 through 3191, approvals from the Amusement Ride & Tramway Division, including a Certificate of Construction.

Los Angeles County Metropolitan Transportation Agency (Metro)

4. Approvals determined necessary by Metro for the Project, could include, but not necessarily be limited to, the following:
    a. Pursuant to Public Utilities Code section 130252, submittal, review, and approval of proposed plans for design, construction, and implementation of the Project.
    b. Pursuant to Public Utilities Code section 130521 and Civil Code section 801, an easement or other agreement or approval to authorize the construction and operation of the Project within a portion of Los Angeles Union Station.
    c. Pursuant to Public Utilities Code section 130521, an encroachment permit or other agreement or approval to authorize construction and operation of the Project within any Metro L Line (Gold) right-of-way.

City of Los Angeles

5. Approvals determined necessary by the City for the Project, could include, but not necessarily be limited to, the following:

a. Pursuant to Charter section 390 and Los Angeles Administrative Code section 13.4, to the extent applicable, to be processed by the Department of Public Works, Bureau of Engineering and the Department of Transportation, a franchise agreement to operate "upon, over, under, or along any street, highway or other place in the City of Los Angeles."

b. Pursuant to Los Angeles Administrative Code section 22.109, to the extent applicable, approval of the design from the Cultural Affairs Commission for the Project components located within the public right-of-way.

c. Approvals, to the extent applicable, to be processed by the Department of City Planning, could include, but not necessarily be limited to, the following:

   i. Pursuant to LAMC section 11.5.7 the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures.

   ii. Pursuant to LAMC sections 13.11 and 12.32.S, a "SN" Sign District for a comprehensive set of sign regulations on the Project site to permit signage consistent with applicable City requirements.

   iii. Pursuant to LAMC section 12.24.M, a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow Stadium Tower and Dodger Stadium Station. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events."

   iv. Relief from the River Implementation Overlay District, to allow for Alameda Station, Alameda Tower, and Alpine Tower.

   v. Relief from the Cornfield Arroyo Seco Specific Plan to allow for Chinatown/State Park Station.

d. Pursuant to Government Code sections 65864 through 65869.5, a Development Agreement between the Project Sponsor and the City of Los Angeles for 20 years.

Other discretionary and ministerial permits, approvals, consultations, and coordination will or may be required, including, but not limited to, temporary street closure permits, demolition permits, grading permits, excavation permits, archaeological permits, encroachment permits, building permits, dewatering permits, stormwater permits, noise variances, work hour variances, haul routes, sign permits, any operational agreements, consultation with the State Historic Preservation Officer and other agencies, and any applicable permits or clearances related to water and/or energy infrastructure or emergency access.

Section 4.0 | Costs and Financing

4.1 INTRODUCTION

This section summarizes the capital, operating, and maintenance costs and planned sources of funding for the proposed Project. This analysis is intended to assist the lead agency and responsible agencies, as well as stakeholders and the general public, in understanding the costs of the proposed Project, as well as proposed funding sources.

4.2 COSTS AND FUNDING

This section presents the cost of the proposed Project as well as the proposed funding and financing sources for the proposed Project. The capital costs for the proposed Project are presented in 2021 dollars.

4.2.1 Capital Costs

Capital cost estimates for the proposed Project are based on conceptual engineering drawings. Further technical refinements to the proposed Project and the potential selection of alternative designs during the approval process may impact capital costs. The capital costs are estimated at $385 - 500 million. Construction of the proposed Project assumes prevailing wages pursuant to a Project Labor Agreement.

Table 4-1 Capital Cost Estimates for the Proposed Project

Cost Category	Cost Estimate
Construction	$275 – 325 million
Gondola System Equipment and Cabins	$75 - 100 million
Soft Costs	$15 – 25 million
Contingency	$20 - 50 million
Total	**$385 - 500 million**

4.2.2 Operating and Maintenance Costs

Based upon the proposed service levels, the proposed Project operations and maintenance costs are projected at approximately $8 - 10 million per year (inclusive of capital reserve funds). Operation and maintenance costs are proposed to be fully funded out of Project revenues. Operations and maintenance costs assume prevailing wages. These costs are estimated in 2021 dollars.

4.2.3 Capital Funding Sources

The primary source of capital funding for the proposed Project would be bond financing serviced by revenue from the proposed Project. The revenue available for bond servicing is net of the costs of operation and maintenance costs represented in the above section. The primary sources of revenue for the proposed Project are farebox revenues and naming rights sponsorship revenue,[1] after which operating costs are deducted. The bond financing for the proposed Project assumes the independent credit rating of the proposed Project. The proposed Project is not seeking Metro funding. In addition, no other sources of public funding have been sought or committed to the proposed Project.

[1] Refer to Topical Response K, Signage and Lighting.

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Section 5.0 | Corrections and Additions

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed Project. Such changes are a result of public and agency comments received in response to the draft EIR and/or new information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed Project. This section is divided into three parts: Section 5.1, General Corrections and Additions to the Draft EIR; Section 5.2, Corrections and Additions to Draft EIR Sections and Appendices; and Section 5.3, Effect of Corrections and Additions.

5.1 GENERAL CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

5.1.1 Metro's Regional Connector

Subsequent to the release of the Draft EIR, Metro's Regional Connector opened on June 16, 2023.[1] The Regional Connector extends the Metro light-rail system to connect the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station through the development of three new stations at 1st Street and Central Avenue (Little Tokyo/Arts District Station), 2nd Street and Broadway (Historic Broadway Station), and 2nd Place and Hope Street (Grand Avenue/Bunker Hill Station). This project improves regional access by providing a direct connection between each end of the light rail system (Azusa to Long Beach and East Los Angeles to Santa Monica). As discussed in Section 5.2.17, Transportation, of Section 5.0, Other CEQA Considerations, of the Draft EIR, with the opening of the Regional Connector, passengers will no longer need to transfer at Los Angeles Union Station and are expected to experience reduced travel times.

5.1.2 Metro L Line (Gold) Name Change

Subsequent to the release of the Draft EIR, on June 16, 2023, in connection with the opening of Metro's Regional Connector, Metro changed the name of the L Line (Gold). The part of the former L Line (Gold) between Little Tokyo/Arts District Station and APU/Citrus College station became part of the A Line (Blue), and the part of the former L Line (Gold) between Little Tokyo/Arts District Station and Atlantic Station became part of the E Line (Gold).[2] The proposed Project area includes the part of the former L Line (Gold) that is now part of the A Line (Blue). References in the Draft EIR and this Final EIR to the L Line (Gold) refer to the A Line (Blue).

5.1.3 Downtown Community Plan

The City of Los Angeles' Land Use Element is comprised of 35 Community Plans, which establish neighborhood-specific goals and implementation strategies to achieve the broad objectives laid out in the City of Los Angeles General Plan. The proposed Project alignment is located within the boundaries of the

[1] Los Angeles County Metropolitan Transportation Authority. 2023. Free rides across the Metro system this weekend to celebrate the debut of the new A and E Lines, 3 new stations and the opening of the Regional Connector. Available at: https://thesource.metro.net/2023/06/13/free-rides-across-the-metro-system-this-weekend-to-celebrate-the-debut-of-the-new-a-and-e-lines-3-new-stations-and-the-opening-of-the-regional-connector/. Accessed September 2023.

[2] Los Angeles County Metropolitan Transportation Authority. 2023. Free rides across the Metro system this weekend to celebrate the debut of the new A and E Lines, 3 new stations and the opening of the Regional Connector. Available at: https://thesource.metro.net/2023/06/13/free-rides-across-the-metro-system-this-weekend-to-celebrate-the-debut-of-the-new-a-and-e-lines-3-new-stations-and-the-opening-of-the-regional-connector/. Accessed September 2023.

Central City Community Plan Area, Central City North Community Plan Area, and the Silver Lake-Echo Park-Elysian Valley Community Plan Area.

The Draft EIR's Regulatory Setting included an overview of DTLA 2040. As discussed in Sections 3.1.1, 3.3.1, 3.4.1, 3.6.1, 3.8.1, 3.11.1, 3.14.1, 3.16.1, Regulatory Setting, of the Draft EIR, "The City is currently working on an update to the Downtown Community Plan, known as DTLA 2040, which would consolidate the Central City Community Plan and Central City North Community Plan areas. Because it is unknown when the new community plan would be adopted and its EIR certified, the analysis in this section is based on the current applicable" plans and/or land use and zoning designations. As discussed in Sections 3.5.1, 3.9.1, 3.15.1, and 3.19.1, Regulatory Setting, of the Draft EIR, "The City of Los Angeles is currently in the process of updating the Central City and Central City North Community Plans through the Downtown Los Angeles 2040 Draft Community Plan. Because it is unknown when the new community plan would be adopted and its EIR certified, the analysis in this section is based on the current applicable plans." As discussed in Section 3.17.1, Regulatory Setting, of the Draft EIR, "The City is currently working on an update to the Downtown Community Plan, known as DTLA 2040, which would consolidate the Central City Community Plan and Central City North Community Plan areas. The proposed DTLA 2040 Community Plan includes land use designation and zoning changes, as well as street network and circulation changes. The transportation model forecast for the proposed DTLA 2040 Community Plan using the City of Los Angeles travel mode is used in the forecast of future conditions for the Project study area, as it represents the most current detail for what is expected in the future."

On May 3, 2023, following the circulation of the Draft EIR for public review, the Los Angeles City Council approved DTLA 2040, and the comprehensive update to the City of Los Angeles Zoning Code for the DTLA 2040 area. Following this approval, the City has entered the implementation phase for DTLA 2040, and implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law, which the City has indicated can take approximately six months to a year.[3] After this implementation process is complete, DTLA 2040 and the new Zoning Code will be brought into effect by the City Council, and accordingly the Plan and new Zoning Code are not currently in effect and it is unknown whether they would be in effect at the time the proposed Project's EIR is certified. Accordingly, the analysis in this EIR is based on the current applicable land use and zoning designations. An overview of the proposed Project's consistency with the DTLA 2040 plan's key applicable principles, goals, and policies is provided below for informational purposes.

One of DTLA 2040's guiding principles is to "promote a transit, bicycle, and pedestrian-friendly environment," by "expanding transit service," and "improving connectivity" Downtown. (DTLA 2040, Chapter 1, p. 10.) The proposed Project is consistent with this guiding principle, and would "expand transit service" by creating new and improving existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, the Chinatown Metro L Line (Gold) station, and several regional and local bus lines serving the Project Study Area. In addition, the proposed Project would be ADA accessible and compliant. The cabins allow for wheelchairs, bicycles, and strollers, and easy entry and exit for passengers connecting to and

[3] See City of Los Angeles Department of City Planning. 2023. Downtown Los Angeles Community Plan Update. Available at: https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about. Accessed August 2023.

from other modes of transit. The proposed Project's compatibility with bicycles would also support "bike infrastructure." (DTLA 2040, Chapter 1, p. 11.)

Further, Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around the Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. As such, the proposed Project would enhance pedestrian safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area, thus promoting a "pedestrian-friendly environment." Additionally, the proposed Project would include a number of pedestrian enhancements and mobility hubs that would provide new multi-modal connection options. For example, the proposed Project is designed to be consistent with Metro's LAUS Forecourt and Esplanade Improvements Project, which involves repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. In addition, the proposed Project proposes a new pedestrian plaza at El Pueblo north of the Placita de Dolores. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing pedestrian access to both LAUS and El Pueblo. In addition, both the Chinatown/State Park Station and Dodger Stadium Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements at the Chinatown/State Park Station would include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Dodger Stadium Station would provide pedestrian network improvements around the station, including repaving pedestrian paths through the Dodger Stadium parking lot to channelize and provide a safe connection for pedestrians traveling between the station and the stadium. Accordingly, the proposed Project is consistent with DTLA 2040's guiding principles.

The proposed Project is also consistent with Downtown-wide goals and policies outlined in DTLA 2040 that seek to support sustainable transportation options. Policy LU 1.1 seeks to "ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities." (DTLA 2040, Chapter 2, p. 18.) The proposed Project would enhance community connectivity to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, and provide pedestrian enhancements in the areas surrounding the proposed Project's stations, thus providing community amenities and access to parks. In addition, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Further, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles, thus providing transit in furtherance of "complete neighborhoods."

DTLA 2040 Policy LU 17.9 calls for the Plan to "support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality." As a zero-emission project, the proposed Project is consistent with these aims. The proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, as discussed in GHG-PDF-A. Further, the proposed Project's backup power would be provided by battery storage located at each station and tower and the non-passenger junction. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel are discussed in Section 3.3, Air Quality, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. In addition, given the capacity of this system, approximately 20 percent of Dodger fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled. Therefore, the proposed Project is consistent with Policy LU 17.9's aim of supporting efforts to reduce GHG emissions and improve air quality.

Other neighborhood policies are aimed at improving transit connections. (See, e.g., LU Policy 49.4, DTLA 2040, Chapter 2, p. 47 ["Enhance the public realm and improve transit connections to neighboring places."].) The proposed Project would facilitate these policies by providing an additional transit option in Downtown. For instance, the proposed Project would provide new transit and pedestrian connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, Echo Park, and Solano Canyon. As such, the proposed Project would enhance community connectivity and improve transit connections by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.

With respect to El Pueblo, DTLA 2040 Policy LU 53.11 seeks to "provide[] clear access to the historic district," while Policy LU 53.12 looks to "encourage more active nighttime uses." (DTLA 2040, Chapter 2, p. 49.) The proposed Project would provide a connection to and from El Pueblo via Alameda Station, providing new and enhanced connections from the El Pueblo area with downtown areas including LAUS, Dodger Stadium, the Chinatown/State Park and other local transit lines along the proposed Project alignment and the regional transit system. The proposed Project's new pedestrian plaza at El Pueblo is consistent with Policy LU 53.11 as it creates a new, identifiable pedestrian entry point to El Pueblo in an area that currently contains a parking and loading area for El Pueblo. The proposed Project is consistent with Policy LU 53.12 as it would provide a link to El Pueblo before and after Dodger games, thus supplying

additional visitors to the El Pueblo and incentivizing nighttime uses to capture these visitors. Therefore, the proposed Project is consistent with these policies.

Further, the proposed Project is consistent with policies aimed at assisting businesses. For example, Policy LU 7.10 seeks to "support existing neighborhood stores (i.e., mom-and-pop shops that support the needs of local residents, are culturally relevant, and create a stable economic environment,") and Policy LU 6.2 seeks to "promote a pluralistic economy by supporting dynamic partnerships among local academic institutions, government, businesses, and nonprofit organizations." (DTLA 2040, Chapter 2, pp. 22-23.) Similarly, Policy LU 42.10 aims to "[s]upport and reinforce the historic and cultural components of Chinatown, including architectural design, and the long-standing local businesses and legacy institutions that serve the local community." (*Id*., p. 44.) The Project Sponsor, LA Aerial Rapid Transit Technologies LLC, was donated in 2023 to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. In addition to providing accessible and affordable mobility options for these businesses' employees and area residents, the proposed Project would create economic opportunities for potential partnerships with these businesses, consistent with the policies aimed at fostering partnerships between businesses and nonprofit organizations. The proposed Project could partner, for example, with the Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses, consistent with the policy of supporting existing neighborhood stores. The proposed Project includes other features to enhance and provide additional benefit to the surrounding community, including but not limited to the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. Therefore, the proposed Project is consistent with the goals and policies aimed at supporting businesses.

The proposed Project is also consistent with DTLA 2040 goals and policies related to public art. For example, Policy LU 15.6 looks to "Encourage new development to incorporate culturally relevant and community-driven public art along building facades and in outdoor areas." (DTLA 2040 Chapter 2, p. 27.) Each station, including Alameda Station, would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture that could be commissioned from local artists. Therefore, the proposed Project would be consistent with this policy.

In addition, the proposed Project is consistent with DTLA 2040's goals and policies concerning mobility and connectivity. Policy MC 2.5 seeks to "[f]acilitate integration between different modes of travel to create a seamless experience as users switch between modes and to promote transit use and active transportation." (DTLA 2040, Chapter 3, p. 52.) Goal 4 looks to provide a "safe and integrated bicycle network that provides access to transit and key destinations." (*Id*., p. 53.) The proposed Project's cabins will be large enough to accommodate bicycles, and the proposed Project (an aerial rapid transit system) would connect to the region's public transportation hub at LAUS. The proposed Project would also provide mobility hubs at both the Chinatown/State Park Station and Dodger Stadium Station for passengers to be able to access a suite of first and last mile multi-modal options, including a bike share program and individual bike lockers, facilitating connections to parks and adjacent neighborhoods.

Accordingly, the proposed Project would "facilitate integration between different modes of travel," and further the City's bicycle network. For the same reasons, the proposed Project would be consistent with Policy MC 4.4, which aims to "[f]acilitate the integration of bikes on transit to improve first-last mile connections," (*id*., p. 55) and would support the Draft Plan's ability to engage in Metro's "First-mile, Last-mile" program, which provides "implementing improvements for first and last mile (FLM) portion[s] of an individual's trip, and provides a vision for addressing FLM improvements in a systematic way." (*Id*., p. 72.) Therefore, the proposed Project is consistent with DTLA 2040's goals and policies related to mobility and connectivity.

Therefore, the proposed Project would be consistent with DTLA 2040's principles, goals, and policies.

5.1.4 Mobility Hub at Dodger Stadium

Section 2.0, Project Description, of the Draft EIR, stated that the Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for Dodger Stadium Station to potentially include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Issues to be addressed in connection with a potential mobility hub could include maintaining security for Dodger Stadium and the surrounding surface parking areas. In response to comments on the Draft EIR and after further coordination with the Los Angeles Dodgers, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Accordingly, all references to "potential" or "potentially" when discussing the mobility hub at Dodger Stadium Station should be considered stricken (e.g., ~~potential~~ mobility hub at Dodger Stadium Station).

5.1.5 Additional Separation Buffer

Comments on the Draft EIR requested additional information on the Additional Separation Buffer described in Section 2.0, Project Description, of the Draft EIR and analyzed as part of the proposed Project in Section 3.0, Environmental Analysis, of the Draft EIR. As discussed in Appendix N, Additional Separation Buffer, of this Final EIR, based on the current design, the Additional Separation Buffer is estimated to be approximately 10 feet on each side of the required aerial clearance width based on applicable standards, requirements, building codes, and guidelines. The proposed Project's Additional Separation Buffer would comply with applicable standards, requirements, building codes, and guidelines as determined by the City of Los Angeles and Metro. The final width of the Additional Separation Buffer would be determined by the appropriate agencies during the permitting process for the proposed Project. Nevertheless, for informational purposes, the estimated square footage of the Additional Separation Buffer is provided in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, in the Final EIR.

5.1.6 LADWP Service Letter

On October 5, 2023, the Los Angeles Department of Water and Power (LADWP) issued a response letter detailing LADWP's ability to provide water and electric services for the proposed Project. LADWP's response letter indicates that it would be able to provide the water service for the domestic needs for the proposed Project. In addition, LADWP's renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. A small portion (i.e., less than 0.5 percent) of the proposed Project's electricity usage would be related to the Los Angeles State Historic Park's operation of park amenities at the Chinatown/State Park Station, which would be operated by the Los Angeles State Historic Park. This electricity would be supplied by LADWP's standard electricity portfolio.

5.1.7 Senate Bill 44 Extension | Senate Bill 91

Subsequent to the release of the Draft EIR, on October 10, 2023, Governor Newsom approved Senate Bill 91 (SB 91), extending CEQA streamlining provisions for "environmental leadership transit projects" previously provided under Senate Bill 44 and codified in Public Resources Code section 21168.6.9. SB 91 contains the same substantive provisions as SB 44. References in the Draft EIR and this Final EIR to SB 44 also refer to SB 91.

5.1.8 Aesthetics

Analysis of Supplemental KOPs in Response to Comments

Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, include a detailed discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Visual simulations were created to reflect the proposed Project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation.

In response to comments on the Draft EIR, supplemental and additional KOPs were prepared, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for the additional visual simulations of the proposed Project. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared.

The supplemental KOPs were updated to clarify the following design elements of the proposed Project:

- Maximum Operating Capacity. KOPs were updated to depict the system operating at maximum capacity, including passengers within the cabins. At maximum capacity and during peak operations, outside of the station the cabins would be spaced approximately 450 feet apart.

- Signage Program. KOPs were updated to incorporate the proposed Project's signage program, as depicted in the Sign Concept Plan, included as Appendix B to the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR.
- Ropeway Cables | Slack Carriers. KOPs were updated to clarify the dimensions and spacing of the ropeway cables, as well as spacing of the slack carriers that maintain clearance between the three ropes that comprise the ropeway. The proposed Project's ropes would be 1.75 to 2.5 inches in diameter. As 1.75 to 2.5 inches in diameter is too small to be visually detectable in many of the Draft EIR KOP, except as noted, the supplemental KOPs depict ropes modeled with a 6-inch diameter to make them more noticeable. Updates were also made to KOPs where it appeared that only two ropes were visible instead of three. Slack carriers in the ropeway were also incorporated and are spaced 350 feet apart. Slack carriers are devices that support and maintain proper separation between the cables of a 3S system. Slack carriers are attached to the system's two stationary cables (the "track ropes") and provide support sheaves for the third cable that circulates continuously around the system (the "haul rope"). The proposed Project would utilize slack carriers. While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phases of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350 to 500 feet with adequate separation from the stations, junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane. However, as mentioned above, KOPs were updated to depict the slack carriers spaced at 350 feet apart, to present the most conservative scenario.

All KOPs from the Draft EIR are included in Appendix H.2 of the Final EIR. Those that were updated as described above are: KOP 4, KOP 5, KOP 7a, KOP 7b, KOP 8, KOP 9, KOP 10, KOP 11, KOP 12, KOP 13, KOP 14, KOP 15a, KOP 15b, KOP 16a, KOP 16b, KOP 17, KOP 18, KOP 19, KOP 22, KOP 23, KOP 24, KOP 25, KOP 27, KOP 28a, KOP 29.

In addition, in response to comments on the Draft EIR, additional visual simulations of the proposed Project were provided in Appendix H.2 as follows:

- Additional Views of Los Angeles State Historic Park: KOPs 31 through 35 provide additional visual simulations of Los Angeles State Historic Park, including views from a cabin over the Park, and additional views of the Chinatown/State Park Station and proposed Park amenities.
- Additional Views of Alameda Tower and Alpine Tower: KOPs 36 and 37 provide additional views of the locations of the proposed Alameda Tower and Alpine Tower.

As discussed below, the evaluation of updated and additional KOPs for the proposed Project does not result in significant impacts, and the aesthetic impacts of the proposed Project would be less than significant.

Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact (API). However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. The proposed Project would not significantly block scenic or panoramic views. The simulated views of the proposed Project as shown in

supplemental KOPs illustrate that views considered to be scenic locally would not be substantially impacted. In addition, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. While minor design elements of the KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. Therefore, the proposed Project would not substantially affect scenic vistas, and impacts would be less than significant.

Similarly, regarding scenic resources, as analyzed in the Draft EIR, no State- or County-designated scenic highways or eligible State scenic highways are located in the Project area. The Arroyo Seco Parkway/ SR-110, is located within the Project area and is a National Scenic Byway and a California Historic Parkway. However, the Arroyo Seco Parkway/SR-110 is not a State scenic highway. As concluded in the Draft EIR, the proposed Stadium Tower, as well as cables and cabins, would be visible to motorists on Arroyo Seco Parkway/SR-110 both on the northbound and southbound sides. However, the proposed Project would not damage any scenic resources within a State scenic highway, as the Arroyo Seco Parkway/SR-110 is not a designated State scenic highway. While minor design elements of the supplemental KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed, and no new scenic highways exist in the Project area. As such, the proposed Project would not substantially damage scenic resources with a State scenic highway, and no impact would occur.

Since the proposed Project is in an urbanized area, the proposed Project was analyzed for its potential to conflict with applicable zoning and other regulations governing scenic quality, in accordance with State CEQA Guidelines Appendix G. As concluded in the Draft EIR, the proposed Project would represent an overall change in views and visual quality and character as compared to existing conditions. However, the proposed Project is in an urban area that currently has a mix of architectural styles and building materials and colors. Although viewer groups may have varying sensitivities to the visual change associated with the proposed Project, the Draft EIR concluded that the proposed Project would be consistent with applicable zoning and other regulations governing scenic quality and the operation of the proposed Project would have less than significant impacts related to visual character and quality. The addition of design elements in the supplemental KOPs such as ropes, slack carriers, and signage, as well as depicting the system operating at maximum capacity, including passengers within the cabins, represent minor changes to the KOPs. The proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. In addition, the proposed Project's cables, provided at a larger scale in the simulations to be visible, would have similar characteristics to the overhead power lines that are prevalent in views in the area. Further, as discussed in Appendix C, Visual Impact Assessment, to the Draft EIR, and shown in the supplemental KOPs included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. In addition, consistent with the City's Framework Element Chapter 5 Urban Form and Neighborhood Design Policy 5.8.4, signage would also be designed to be

integrated with the architectural character of the surrounding buildings to convey a visually attractive character. Further, as illustrated in Appendix H.2 Supplemental KOPs in Response to Comments, of the Final EIR, the type and extent of proposed signage would emphasize the transit use of the proposed Project and would complement the existing and approved signage environment along the proposed Project alignment. The proposed Project's signage would create a uniform visual identity that would connect the entire proposed Project alignment. Overall, as discussed in Section 3.0, Aesthetics, of the Draft EIR, and as further substantiated by the updated and additional KOPs included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, the proposed Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the impact would be less than significant.

Regarding light and glare, the Lighting Study for the proposed Project, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, was conducted to determine the potential environmental impacts resulting from the proposed Project's lighting and illuminated signage program. Based on the analysis in the Lighting Study, the Draft EIR concluded that the proposed Project would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area and would comply with applicable City regulations related to light and glare. Therefore, impacts were determined to be less than significant. While the additional and supplemental KOPs were updated to incorporate all elements of the proposed Project's signage program, impacts to light and glare associated with the proposed signage as depicted in the Sign Concept Plan, were included and comprehensively analyzed within the Draft EIR and associated Appendix C, Visual Impact Assessment. The updated KOPs are illustrative in nature, and do not represent new or additional signage that could result in new or more severe potential impacts to light or glare. Therefore, impacts to light and glare would be less than significant.

Regarding shading, while minor design elements of the supplemental KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. As such, there are no changes to the shading analysis and impacts related to shading would be less than significant.

5.1.9 Biological Resources

CDFW Recommended PDFs

The California Department of Fish and Wildlife ("CDFW") submitted a comment letter on the Draft EIR (Comment S1) and made certain recommendations regarding biological resources. Following consultation with CDFW, additional Project Design Features were incorporated to provide additional environmental benefits regarding biological resources, as discussed in Section 3.04, Biological Resources, of the Draft EIR. The proposed Project would result in less than significant construction impacts with mitigation, and less than significant operational impacts with respect to biological resources. Additions to the Draft EIR have been provided for Section 3.04, Biological Resources to add these Project commitments as enforceable Project Design Features, BIO-PDF-B, BIO-PDF-C, BIO-PDF-D, BIO-PDF-E, BIO-PDF-F, BIO-PDF-G, and BIO-PDF-H.

Updated Tree Report

Carlberg Associates prepared an inventory of trees located at the proposed locations of the proposed Project's stations, junction, and towers, inclusive of the component's construction zone and where trees along the alignment may interfere with the proposed ropeway and cabins (the "Tree Inventory Report"). This Tree Inventory Report was included as Appendix B to Appendix E, Biological Resources Assessment, of the Draft EIR.

In response to comments on the Draft EIR, the Tree Inventory Report prepared for the proposed Project has been updated to clarify the criteria for inclusion in the report's inventory. The updated Tree Inventory Report is included as Appendix K.1 of the Final EIR. The update clarifies that City of Los Angeles right-of-way trees are inventoried regardless of trunk size. The updated report also clarifies trees within the Los Angeles State Historic Park, including those under the alignment that could potentially interfere with required cabin and ropeway clearances (i.e., those that would or could encroach within 5 feet of the bottom of the cabin and within 50 feet from the centerline of the proposed Project's ropeway). The report was also updated to add a note clarifying the City of Los Angeles' Tree Preservation Ordinance requirements for measuring the diameter of multi-stemmed trees, and the report was updated to use this counting methodology, resulting in an additional 25 "significant" trees inventoried. In addition, certain counting errors were remedied, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as the original Tree Inventory Report. The original and updated Tree Inventory Reports reflect the conditions at the time of Carlberg Associate's survey.

Additional March 23, 2023 Biological Resources Survey

As discussed in Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, two field surveys of the proposed Project alignments were conducted on April 1, 2020, and April 24, 2021, to evaluate existing biological resources. In response to comments on the Draft EIR, a third survey was performed on March 23, 2023, to provide an updated habitat assessment for sensitive species and a supplementary wildlife survey effort.

5.1.10 Cultural Resources

Mitigation Measures CUL-A, CUL-C, and CUL-D

As discussed in Section 3.05, Cultural Resources, of the Draft EIR, the proposed Project would result in potentially significant impacts to archaeological resources. Accordingly, the proposed Project would implement mitigation measures in order to reduce such impacts to less than significant. Where a project would result in potentially significant impacts to archaeological resources, CEQA Guidelines section 15126.4(b) recognizes that "preservation in place is the preferred manner of mitigating impacts to archaeological sites," and that data recovery plans may be prepared "[w]hen data recovery through excavation is the only feasible mitigation." Mitigation Measures CUL-A, CUL-C, and CUL-D have been revised consistent with CEQA Guidelines section 15126.4(b).

5.1.11 Greenhouse Gas Emissions

GHG-PDF-A

As described in Sections 2.0, Project Description, and 3.08, Greenhouse Gas Emissions, of the Draft EIR, the proposed Project voluntarily committed to use electricity supplied from LADWP's Green Power Program to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A.

5.1.12 Hazards and Hazardous Materials

MM-HAZ-A

As discussed in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, the proposed Project would implement Mitigation Measure HAZ-A, requiring preparation of a Soil and Groundwater Management Plan, which would include sampling and analyzing soil and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal. Nevertheless, in response to comments requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the Los Angeles Department of Building and Safety for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

Appendix M, Potential Excavated Material Disposal Analysis

In response to comments on the Draft EIR, Appendix M, Potential Excavated Material Disposal Analysis, of the Final EIR, was prepared to provide additional information on the disposal of excavated material. Appendix M conservatively estimated that approximately 14,119 cubic yards (cy) of material could potentially require disposal at a landfill as waste. Based on the potential contaminants and their concentrations in the excavated material, such material may be classified as 1) non-hazardous, 2) non-RCRA hazardous, or 3) RCRA hazardous. As summarized in Appendix M, it was estimated that 11,802 cy of the 14,119 cy may require disposal at a landfill as non-hazardous waste.

5.1.13 Land Use and Planning

Rim of the Valley Trail Corridor

In 1983, the legislature extended the geographic limits of the Santa Monica Mountains Zone to encompass an area known as the Rim of the Valley Trail Corridor. The Rim of the Valley Trail Corridor is a network of

parks and trails that connects the Santa Monica, Santa Susana, Sespe, and San Gabriel Mountains. It was created to facilitate the development of an interlocking, connected system of public parks, trails and wildlife habitat preserves within mountain areas. In 1990, the Santa Monica Mountains Conservancy (SMMC) published the Rim of the Valley Trail Corridor Master Plan, as authorized by Assembly Bill 1516 (1989), to guide the activities and expenditures of the SMMC over a ten-year planning period in creating a multi-use long distance trail, known as the Rim of the Valley Trail, which would be focused on preservation of important resources and provision of public recreation.

While the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate I-5. The proposed Project would provide access to and connectivity between El Pueblo, Los Angeles State Historic Park, and Elysian Park.

El Pueblo

a) El Pueblo General Plan

Comments on the Draft EIR requested an analysis of the proposed Project's consistency with the El Pueblo General Plan. The Draft EIR discussed the El Pueblo General Plan in Section 3.05, Cultural Resources. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. Further, under the Planning and Zoning Law (Government Code §§ 65000-66499.58), strict conformity with all aspects of a general plan is not required. The proposed Project would be consistent with the El Pueblo General Plan, and therefore, CEQA did not require the Draft EIR to include a discussion of this consistency. Nevertheless, for informational purposes, Section 5.2 of the Final EIR includes an analysis of the proposed Project's consistency with the applicable El Pueblo General Plan goals and policies.

b) El Pueblo Master Plan

On June 2, 2023, the City of Los Angeles, Department of Public Works, Bureau of Engineering, issued Task Order Solicitation (TOS) No. 94 for the El Pueblo Master Plan (Work Order No. E1909106)[4] ("TOS") seeking proposals for comprehensive master planning and design consulting services to redevelop the Master Plan for the El Pueblo de Los Angeles Historical Monument (El Pueblo) ("new El Pueblo Master Plan"). The TOS states that the new El Pueblo Master Plan will assist in the protection and activation of historic and cultural resources, prioritization of future development goals, identification of the highest and best use for future commercial revenue generating opportunities, and the execution of projects. The TOS provides that objectives for the new El Pueblo Master Plan are centered on guiding new development, appropriate adaptive reuse of existing buildings, reinvigorating the commercial vitality of retail and dining, expanding meaningful and accessible cultural and educational offerings, and

[4] City of Los Angeles. 2023. Task Order Solicitation (TOS) No. 94 for the El Pueblo Master Plan (Work Order No. E1909106).

preserving the district's historic scale while linking the area to surrounding cultural districts. The TOS' stated goals for the new El Pueblo Master Plan include the following:

- Include a framework and protocols to initiate public-private development projects between El Pueblo, City Council and interested developers in the Final Master Plan.
- Develop a plan to strengthen pedestrian and public transportation circulation to the adjacent communities and municipal entities such as, but not limited to the adjacent Metro Project and the Downtown Los Angeles Community Plan update.

The City is currently developing the new El Pueblo Master Plan. While the City has articulated objectives and goals in the TOS for the new El Pueblo Master Plan, there is no draft available at the time of drafting this Final EIR. It is unknown when the new El Pueblo Master Plan would be adopted. For informational purposes, this Section 5.1.5 notes that the proposed Project is consistent with the goals as set forth in the TOS. As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores at El Pueblo. There would be two access locations for the Alameda Station – the planned LAUS Forecourt to the east of Alameda Street and the proposed new pedestrian plaza at El Pueblo north of the Placita de Dolores to the west of Alameda Street. Consistent with the goal to strengthen pedestrian and public transportation circulation to adjacent communities, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS, as well as the businesses at El Pueblo and downtown Chinatown. The proposed Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

Consistent with the goal of reinvigorating the commercial vitality of retail and dining, and expanding meaningful and accessible cultural and educational offerings, as discussed in Topical Response C, Project Features, this new mode of transportation will expand rider access to the regional transit system by attracting new visitors, and represents an opportunity to increase pedestrian traffic along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to El Pueblo, Chinatown and other areas along the proposed Project alignment, which, consequently, adds revenues to these businesses in the communities the proposed Project hopes to serve. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The proposed Project would provide area residents and businesses with safe, affordable, and clean transit access to local businesses and institutions. The proposed Project could partner, for example, with the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants to help in addressing visitor,

educational, and customer access to these businesses and institutions. In addition, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, the Dodger Stadium property and its history as it relates to Chavez Ravine, and Elysian Park.

The proposed Project is consistent with the goal of preserving El Pueblo's historic scale. Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR, for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources, including the Los Angeles Plaza Historic District (referred to as El Pueblo de Los Angeles). Construction and operational historic resources impacts associated with the proposed Project would be less than significant, including with respect to the Los Angeles Plaza Historic District.

5.1.14 Noise

3S Gondola System Sound Measurements Memo

Appendix L, 3S Sound Measurements Memo, of the Final EIR, is a memorandum from Leitner Poma providing additional detail on the operational noise from the 3S gondola system in Tyrol, Austria at the Stubai Glacier. This memorandum was provided as an update to a prior memorandum from Leitner Poma about its 3S gondola system, which is included in the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Appendix L, 3S Sound Measurements Memo, of the Final EIR, provides additional detail about the Leitner Poma 3S gondola system but does not change any of the information previously provided as part of the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. The information from Appendix L, 3S Sound Measurements Memo, of the Final EIR, is used in Topical Response P, Gondola System Noise Model, to respond to comments concerning the noise model used to predict noise levels from operations of the proposed Project.

Revisions to Mitigation Measure VIB-A

As described in Section 3.13, Noise, of the Draft EIR, the proposed Project outlined in Mitigation Measure VIB-A that vibration monitoring equipment would be placed "at least 26 feet away" from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery. This mitigation measure has been revised to specify that the monitoring equipment would be placed at a distance of "approximately 26 feet" in responses to comments suggesting that the measure should specify the maximum distance away from the resources where the equipment could be located and still detect potential vibration. This revision clarifies the location of such equipment.

5.1.15 Transportation

Revisions to Mitigation Measure TRA-A and Add TRA-PDF-A

As described in Section 3.17, Transportation, of the Draft EIR, the proposed Project had outlined in Mitigation Measure TRA-A certain "visibility enhancement features," outlining potential options for such

features to increase pedestrian visibility near the Alameda Tower and near the Chinatown/State Park Station at the driveway crossing south of the Los Angeles State Historic Park. As stated on page 3.17-41, the specific mitigation at Alameda Tower is to prohibit right turns on red from westbound Alhambra Avenue to northbound Alameda Street. As stated on page 3.17-42, the specific mitigation at Chinatown/State Park Station is channelization of pedestrians to the crosswalk where visibility is sufficient. In response to comments on the Draft EIR suggesting that Mitigation Measure TRA-A did not clearly define the visibility enhancements for the proposed Project, Mitigation Measure TRA-A has been revised to identify the necessary mitigation for each location, consistent with the analysis in the Draft EIR.

Mitigation Measure TRA-A would reduce potential hazards due to a geometric design feature to less than significant, including for pedestrians at the driveway crossing south of the Los Angeles State Historic Park due to the channelization measure provided in Mitigation Measure TRA-A in order to limit the potential for pedestrians to cross behind the Chinatown/State Park Station's columns. The proposed Project does not result in any potential visibility hazards related to the sidewalk at this location, as discussed on page 3.17-42 of the Draft EIR, which notes that "pedestrians crossing in the crosswalk across the existing driveway immediately south of the Los Angeles State Historic Park would be fully visible to vehicles turning into the existing driveway, and no sight distance obstructions would be present." Nevertheless, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Dodger Stadium Game / Event Fares

As discussed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR, the proposed Project's ridership model is based on data, including anticipated fares. In response to comments on the Draft EIR, Appendix N has been revised to clarify that the model assumes no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year.

Tourist Ridership

Appendix N of the Draft EIR includes the HR&A Analysis of Potential LA ART Tourist Ridership. In response to comments on the Draft EIR, "tourist" riders refer to all riders except riders to Dodger games/events at Dodger Stadium and community transit riders (i.e., those under the Community Access Plan described in Section 3.0, Project Description, of this Final EIR).

5.1.16 Wildfire

Memo Regarding Attorney General Guidance

In October 2022, the California Attorney General published guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for new development ("Wildfire Guidance"). The Wildfire Guidance focuses on CEQA compliance related to a proposed project's impacts on wildfire ignition risk, emergency access, and evaluation. The Wildfire Guidance recommends evaluation of local fire history, fire characteristics of the site (weather, slope, etc.), anticipated fire behavior, evacuation, and other factors that may influence a project's potential to cause wildfire impacts under CEQA. The Guidance is not binding on lead agencies and is intended to provide "suggestions" for the CEQA wildfire analysis. Nevertheless, an

overview of the Wildfire Guidance and Section 3.20, Wildfire, and Appendix P, Fire Hazard Assessment, of the Draft EIR, has been prepared and is provided in Appendix J to the Final EIR.

5.1.17 Alternatives

Pedestrian Enhancement Alternative

As discussed in Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, one of the requirements for an alternatives analysis as set forth in the CEQA Guidelines is identification of alternatives that were considered by the lead agency but were dismissed as infeasible during the scoping process. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. (CEQA Guidelines, § 15126.6(c).)

Comments on the Draft EIR suggested that a Pedestrian Enhancement Alternative, which would study a project alternative for more bike lanes, widened and improved sidewalks with enhanced safety features, and an escalator up the hill to Dodger Stadium, should have been considered. In response to those comments, a Pedestrian Enhancement Alternative connecting the Metro L Line (Gold) Chinatown Station to Dodger Stadium has been considered but dismissed from further detailed analysis because it does not meet most of the basic project objectives.

5.1.18 Other CEQA Considerations

Chavez Ravine

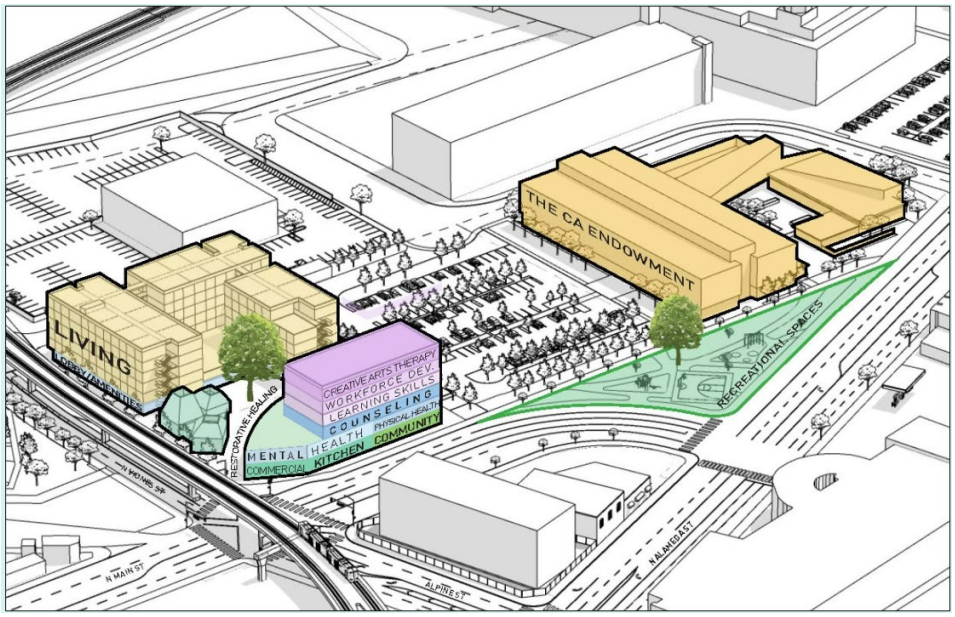
As described in Appendix F, Archaeological and Paleontological Resources Assessment, and Appendix G, Historical Resource Technical Report, of the Draft EIR, the former site of the community of Chavez Ravine, including the neighborhoods of Palo Verde, La Loma, and Bishop, is the current location of the Dodger Stadium property. The location of the proposed Project, including the location of the proposed Stadium Tower and the Dodger Stadium Station, was an area of a steep slope that was not developed as part of the three communities at Chavez Ravine. As described in the Historical Resources Technical Report, the residents, generations of Mexican Americans, lived a generally rural lifestyle and established their own stores, schools, and churches within Chavez Ravine. As described in the Archaeological and Paleontological Resources Assessment, the City of Los Angeles acquired Chavez Ravine in the early 1950s through the process of eminent domain with the intention of building new public housing on the site. Due to a City moratorium on the construction of public housing, this housing was never constructed. Subsequently, in 1957, the City transferred most of the area known as Chavez Ravine to the Brooklyn Dodgers for the construction of a Major League Baseball stadium. Dodger Stadium opened on the Dodger Stadium property in 1962.

The proposed Project will create opportunities for recognition of history and culture. The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide interpretation and acknowledgment of the history associated with Chavez Ravine. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of culture and history of the Dodger Stadium property and its history as it relates to Chavez Ravine and Elysian Park.

Hope Village

Subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023[5] with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as "RECREATIONAL SPACES."

The following graphic from the Annual Report 2023 depicts the recreational spaces.



As detailed in Section 2.0, Project Description, of the Draft EIR, the proposed Project proposes to locate the Alameda Tower in the northwest corner of the Alameda Triangle. The Alameda Tower base would be 900 square feet. Refer to Figure 2-12: Proposed Alameda Tower Location, of the Draft EIR. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

The proposed Project would not impair or impact The California Endowment's potential use of the Alameda Triangle for recreational spaces. As noted, the Tower base would be located in 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic depicts the Alameda Triangle, including space for both the Alameda Tower and potential recreational spaces based on the graphic in the Annual Report 2023.

[5] The California Endowment. 2023. Annual Report 2023. Available at: https://www.calendow.org/annual-report/. Accessed September 2023.

The proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces.

Office Building at 130 West College Street

In March 2023, Steven J. Riboli of S&R Partners, LLC announced plans to redevelop a surface parking lot at 130 West College Street with a five-story building featuring approximately 225,000 square feet of offices above approximately 8,200 square feet of ground-floor commercial space.[6] An application for this proposed development was filed with the City of Los Angeles on April 4, 2023,[7] subsequent to the release of the Draft EIR. The proposed Project alignment would not require aerial rights requirements over 130 West College Street.

5.1.19 Appendix Q, Proposed Alignment Plan and Profile

Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR includes additional detail and graphics as to the proposed Project alignment, including portions of the alignment over public ROW, publicly

[6] Sharp, Steven. 2023. Five-story office building planned at 130 W College Street in Chinatown. Available at: https://la.urbanize.city/post/five-story-office-building-planned-130-w-college-street-chinatown. Accessed September 2023. See also Grimshaw. 2023. Grimshaw to transform LA Chinatown parking lot into all-electric mass timber office building. Available at: https://grimshaw.global/assets/uploads/130_West_College_Street_Grimshaw_Press_Release_1.pdf. Accessed September 2023.

[7] City of Los Angeles Department of City Planning. 2023. CPC-2023-2306-GPA-VZC-HD-MCUP-SPR. Available at: https://planning.lacity.org/pdiscaseinfo/search/encoded/MjY2MjM10. Accessed September 2023.

owned property, and private properties. The proposed alignment profile also is provided in Appendix Q, Proposed Alignment Plan and Profile. In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are difficult to read due to the scale of the graphics, Appendix Q has been updated in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, in the Final EIR, to add larger insets of several graphics for informational purposes, including: ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting ANSI Requirements and Additional Separation Buffer; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Public ROW | Publicly-Owned Property and Private Property; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Public ROW | Publicly-Owned Property and Private Property for which Project Sponsor has an Arrangement for Aerial Rights, and Private Property for which Project Sponsor Does Not have an Arrangement for Aerial Rights; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Respective Ownership of Public Property and Private Property; and the Profile. These supplemental graphics are larger scale insets of the graphics originally provided in Appendix Q of the Draft EIR. No changes to the graphics from Appendix Q were made. Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of this Final EIR, includes these larger scale versions of these graphics. Text describing the square footage of the estimated Additional Separation Buffer has also been provided for informational purposes in Appendix O.

5.1.20 Design Options A and B Plan and Profile

Appendix P, Design Option A Plan and Profile, and Appendix Q, Design Option B Plan and Profile, of this Final EIR, include additional detail and graphics as to the Design Option A and Design Option B alignments, respectfully, including portions of the alignments over public ROW, publicly owned property, and private properties. Text describing the square footage of the estimated Additional Separation Buffer has also been provided for informational purposes.

5.2 CORRECTIONS AND ADDITIONS TO DRAFT EIR SECTIONS AND APPENDICES

Additional changes have been made to the Draft EIR based on comments and/or new information that has become available since publication of the Draft EIR. Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section or appendix heading. Deletions are shown with ~~strikethrough~~ and additions are shown with <u>underline</u>. All citations to the Draft EIR refer to the version of the Draft EIR as originally released for public review and comment on October 17, 2022, and not as modified by this Final EIR.

ES: EXECUTIVE SUMMARY

Page ES-10, revise the paragraph as follows:

The Dodger Stadium Station is located adjacent to Dodger Stadium, which is operated as an MLB Stadium. The proposed Project would ~~The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger Stadium Station to~~ include a mobility hub at Dodger the Stadium property to provide connectivity to Elysian Park and the surrounding communities. ~~where o~~Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. ~~Issues to be addressed in conjunction with such consideration as to the mobility hub include~~ The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Table ES-2: Summary of Environmental Impacts, page ES-25, revise the first Biological Resources row as follows:

BIO-1: *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*	**Construction:** Significant Impact. **Operations**: Less Than Significant Impact.	**MM-BIO-A:** *Avoid and minimize project-related impacts to special-status and/or roosting bat species*. During the maternity season (April 15 through August 31) prior to construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower) because these locations provide potentially suitable habitat. A visual inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed utilizing acoustic recognition technology to determine if any maternity roosts are present. To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented: At the SR-110 Overpass Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and vibration)	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

		could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity-roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist. To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented: <u>Trees</u> All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree removal. Palm trees are present at the Alameda Station site along Alameda Street and eucalyptus trees are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist. • If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season when <u>the</u> young are self-sufficient. If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have	

		significantly lowered their physiological state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active. • Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16 through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days. o Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately or, after emergence, will avoid returning to the roost. o Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2.	

		• Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal. • The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities. **MM-BIO-B:** *Avoid and minimize project related impacts to nesting birds.* To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction activities that may occur during the nesting season, the following mitigation measure shall be implemented: • Construction activities, including the clearance of trees potentially suitable for nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed: o A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction	

		activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded. o A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300 to 500 foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager and all project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site. o Buffers will be delineated on-site with bright flagging, for easy identification by project staff. The on-site construction supervisor and operator staff	

		will be notified of the nest and the buffer limits and instructed of the sensitivity of the area to ensure the buffer is maintained. o A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season. **BIO-PDF-D:** The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides. **BIO-PDF-G:** Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).	

Table ES-2: Summary of Environmental Impacts, page ES-32, revise the fourth Biological Resources row as follows:

BIO-4: *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*	**Construction:** Significant Impact. **Operations**: Less Than Significant Impact.	Refer to **MM-BIO-A** and **MM-BIO-B** as defined in **BIO-1**. **BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.** The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components: (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

		mortalities detected in the Project area during routine maintenance activities. (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species. (3) Annual reporting criteria and requirements. **BIO-PDF-C: Cabin Window Features.** The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. **BIO-PDF-H**: Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.	

Table ES-2: Summary of Environmental Impacts, page ES-32, revise the fifth Biological Resources row as follows:

BIO-5: *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*	**Construction:** Less Than Significant Impact. **Operations:** No Impact.	No mitigation measures required. **BIO-PDF-A:** The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage. **BIO-PDF-E: Tree Disease Management.** Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed	**Construction:** Less Than Significant Impact. **Operations:** No Impact.

		Project and a tree removal contractor would include the provisions for tree disease management.
		
		BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:
		
		• City of Los Angeles:
		  ○ "Protected" Trees: 4:1
		  ○ Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
		  ○ "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1)
		• California Department of Parks and Recreation: At least 1:1
		• Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1	

Table ES-2: Summary of Environmental Impacts, page ES-33, revise the first Cultural Resources row as follows:

CUL-1: *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*	**Construction:** Significant Impact. **Operations:** Less Than Significant Impact.	Refer to **MM-VIB-A** and **MM-VIB-B** as defined in **NV-2.** *The Winery* **CUL-PDF-A Pre-Construction Documentation of The Winery.** Prior to the~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** Less Than Significant Impact.

		history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The full north elevation (facing Cesar E. Chavez Avenue) and i. The roofline, foundation, and any door, window, or walkway openings, ii. Detail views showing the typical existing condition of the exterior wall, and iii. Detail views showing any existing damage to the exterior such as cracks or spalling b. West elevation (facing Olvera Street), and i. The roofline, foundation, and any door, window, or walkway openings, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar c. East elevation (facing Alameda Street) i. The roofline and foundation, and ii. Detail views showing the typical existing condition of the exterior brick wall iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location.	

		4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need only be distributed to repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs **CUL-PDF-B Post-Construction Documentation of The Winery.** Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).	

		El Grito (The Cry) Mural Project Design Features **CUL-PDF- C Pre-Construction Documentation.** Prior to the ~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the *El Grito* mural, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The entirety of the *El Grito* mural from edge to edge, looking straight on b. The left half of the *El Grito* mural looking straight on c. The right half of the *El Grito* mural looking straight on d. Oblique views illustrating the curvature of the wall e. Sequential photographs showing the various panels and subjects in greater detail f. The back and sides of the curved wall on which the *El Grito* mural is located g. Detail views showing: i. Typical profile view of the *El Grito* mural (e.g., showing the depth of the tiles on the substrate) ii. Notch shapes at the top two corners (two views, left and right) iii. Curved shape of the sides of the *El Grito* mural (two views, left and right side)	

		iv. Typical grout between tiles in two or more locations v. Bottom edge where the *El Grito* mural meets the plaza floor vi. Any existing damage or deterioration prior to construction 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need only be distributed to repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs	

		e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs	

Table ES-2: Summary of Environmental Impacts, page ES-41, revise the second Cultural Resources row as follows:

CUL-2: *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*	**Construction:** Significant Impact. **Operations:** No Impact.	**MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan.** A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda ~~s~~Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." Specifically, the CRMMP shall be applicable to all ground disturbance activities extending into native soils within known archaeological sites and other areas of high	**Construction:** Less Than Significant Impact with Mitigation. **Operations:** No Impact.

		sensitivity. Excavations within or within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground disturbing activities in native soils within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, tTreatment may include implementation of archaeological data recovery excavations to remove the resource~~ or preservation in place~~. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting.	

		If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC. For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal. **MM-CUL-B: Archaeological Resources Worker Training Program.** To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and LASHP staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by LASHP and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological	

		resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP. **MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station).** To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will therefore also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far	

		enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed. If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described. **MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt.** To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant	

		sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described. **MM-CUL-E: Archaeological Testing Plan for Los Angeles State Historic Park.** To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the ADI for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.	

		MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station. After implementation of CUL-E, if it is found that the Park amenities (e.g., concessions and restroom) at the Los Angele State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.	

Table ES-2: Summary of Environmental Impacts, page ES-49, revise the third Cultural Resources row as follows:

CUL-3: ***Would the Project disturb any human remains, including those interred outside of formal cemeteries?***	**Construction: Significant Impact.** **Operations: No Impact.**	**Refer to MM-CUL-D ~~and MM-CUL-F~~ as defined in CUL-2.**	**Construction: Less Than Significant Impact with Mitigation.** **Operations: No Impact.**

Table ES-2: Summary of Environmental Impacts, page ES-53, revise the first Greenhouse Gas Emissions row as follows:

GHG-1: *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*	**Construction:** Less Than Significant Impact. **Operations:** Less Than Significant Impact.	No mitigation measures required**.** **GHG-PDF-A: Green Power.** Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.	**Construction:** Less Than Significant Impact**.** **Operations:** Less Than Significant Impact.

Table ES-2: Summary of Environmental Impacts, page ES-55, revise the first Hazards and Hazardous Materials row as follows:

HAZ-1: *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or*	**Construction:** Significant Impact.	**MM HAZ-A: Prepare a Soil and Groundwater Management Plan:** The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and	**Construction:** Less Than Significant Impact with Mitigation.

disposal of hazardous materials?	**Operations:** Less Than Significant Impact.	Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment. <u>This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater</u>. **MM-HAZ-B: Hazardous Materials Abatement.** Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous	**Operations:** Less Than Significant Impact.

		materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 CFR Section 1926.62 regarding lead construction, and OSHA 29 CFR Section 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including wetting the area to prevent possible release of hazardous materials into the air, removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.	

Table ES-2: Summary of Environmental Impacts, page ES-67, revise the second Noise row as follows:

NV-2: *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*	**Construction:** Significant and Unavoidable. **Operation:** Less Than Significant Impact.	**MM-VIB-A:** *Vibration Monitoring*. Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for: • Vibration Monitoring Equipment: the placement of vibration monitoring equipment ~~at least~~ approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices. • Modification of Vibration Equipment: The monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify	**Construction:** Significant and Unavoidable. **Operation:** Less Than Significant Impact.

		the construction equipment to ensure that the vibration damage threshold is not exceeded. **MM-VIB-B: *Force Adjustable Ground Compaction Devices.*** For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery: • At a distance of 26 feet or more from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities. • Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), El Grito Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. Refer to CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E as defined in CUL-1	

Table ES-2: Summary of Environmental Impacts, page ES-75, revise the third Transportation row as follows:

TRA-3: *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*	**Construction:** Significant Impact. **Operations:** Significant Impact.	**MM TRA-A: Visibility Enhancements:** Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at ~~for~~ the following locations ~~sufficient to alert drivers to the presence of pedestrians~~: • Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn	**Construction:** Less Than Significant Impact with Mitigation**.** **Operations:** Less Than Significant Impact with Mitigation.

		on red from westbound Alhambra Avenue to northbound Alameda Street. • Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks. ~~Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing.~~ The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations. **MM-TRA-B**: *Construction Traffic Management.* Plan**:** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project.	

		The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate: • As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations. • Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT, and would be implemented by the proposed Project if deemed necessary. • As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route	

		vehicular traffic and bicyclists to alternative routes during these periods. • Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction. • Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. • Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project ~~bimonthly~~, or as otherwise determined appropriate by City Staff. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.	

		Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations. **TRA-PDF-A: Additional Visibility Enhancements:** Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.	

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SECTION 1.0 INTRODUCTION

In addition to the general additions and corrections provided above, revise Section 1.0, Introduction, as follows:

Page 1-7, revise the first paragraph as follows:

> The proposed Project would support healthy and equitable communities by providing a ~~potential~~ mobility hub at the Dodger Stadium property, where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program to provide connectivity to Elysian Park and the surrounding communities, as well as a ~~potential~~ mobility hub at the Chinatown/State Park Station.

SECTION 2.0 PROJECT DESCRIPTION

In addition to the general additions and corrections provided above, refer to Section 3.0, Project Description, of this Final EIR for revisions to this section.

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.01 AESTHETICS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.02 AGRICULTURE AND FORESTRY RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.03 AIR QUALITY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.04 BIOLOGICAL RESOURCES

In addition to the general additions and corrections provided above, revise Section 3.04, Biological Resources, as follows:

Page 3.4-1, revise the second paragraph as follows,

> This chapter also includes information from the tree inventory report that was prepared for the Project by Carlberg Associates in March 2022 (Appendix E of this Draft EIR), and the Updated Tree Report that Carlberg Associates prepared in May 2023 (Appendix K.1 of the Final EIR).

Page 3.4-6, revise the second to last sentence of the first paragraph as follows:

> The City's Ordinance requires replacement of protected trees at a ~~2:1~~ 4:1 ratio, and the size and number of replacement trees shall approximate the value of the tree to be replaced.

Page 3.4-8, add the following footnote to the first paragraph:

> Results of the tree inventory prepared for the Project (provided in Appendix E) are also incorporated, and referenced for each Project component site.[1]
>
> [1]Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022 tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 3.4-11, revise the second paragraph as follows,

> ~~Both~~ All three field surveys, discussed in Section 3.4.3, Methodology, conducted for the proposed Project were conducted during the bird breeding season, generally considered to extend from February 1 through September 30, or as early as December or January through July for raptor species. During the surveys, tall structure such as mature trees, power poles and towers, billboards and buildings were scrutinized for the presence of nests. Raptor species such as red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipter cooperii*), great horned owl (*Bubo virginianus*), American crow (*Corvus brachyrhynchos*), and common raven (*Corvus corax*) are known to use tall structures as nesting sites in urban environments. Red-tailed hawk were observed flying in the vicinity of Dodger Stadium during the 2021 survey.

Page 3.4-14, revise the second paragraph as follows:

> A field survey of the proposed Project alignments was conducted on April 1, 2020 during the bird breeding season—generally considered to extend from February 1 through September 15, or as early as December or January through July for raptor species—to document and photograph existing biological resources. During the survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests. A ~~follow-up~~ second survey was conducted on April 24, 2021 to verify and record tree species occurring in the Project component footprints. A third survey was performed on March 23, 2023 to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. This survey effort is discussed in greater detail in Appendix G, Supplemental Biological Resources Report, of the Final EIR. Results of the field surveys were used to determine the presence of biological resources such as sensitive ecological areas, wetlands, wildlife migratory corridors, and/or conserved areas in the Project area, and if those areas could potentially support special-status species and sensitive communities identified during the literature review. Binoculars were used to scan for evidence of wildlife activity and for potential bird nest sites. Seasonal, species specific botanical and wildlife surveys were not conducted as part of this evaluation, because existing conditions in the BSA do not provide the undisturbed native habitats preferred by regional special-status plant and wildlife species.

Page 3.4-14, revise the third paragraph as follows:

A tree inventory report was also prepared by Carlberg Associates on March 28, 2022, for the Project alignment, including the construction zones and areas along the alignment between Project components, and trees that could otherwise encroach within 50 feet from the centerline of the proposed Project's ropeway. Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022, tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR. Trees occurring along the Project alignment were inventoried for species, size, and location. One species protected under the City's Native Tree Protection Ordinance, Mexican elderberry, was identified at the Broadway Junction site, and would be removed by the Project. Western sycamore trees occur in the BSA at the Alameda Tower and Chinatown/State Park Station sites, and toyon at the Chinatown/State Park site. Under the City's Native Tree Protection Ordinance, protected native trees and shrubs that were planted or grown as part of a planting program are not "Protected Trees." A review of historical aerial imagery indicates the western sycamore trees at the Alameda Tower site were intentionally installed as part of a landscaping effort in 2008, when these trees and other ornamental vegetation were planted. Western sycamore trees and toyon shrubs at the Chinatown/State Park site and under the portion of the alignment crossing over the Los Angeles State Historic Park were installed in 2016 during construction of the southern entrance to the Los Angeles State Historic Park, as part of a tree planting program. Therefore, the western sycamore trees and toyon shrubs at both the Alameda Tower and Chinatown/State Park Station sites are not naturally occurring and are not "Protected Trees" subject to the City's Native Tree Protection Ordinance. The western sycamore trees and toyon shrubs that were installed in 2016 at the Los Angeles State Historic Park occur on State property and may require replacement, because they are subject to the California Department of Parks and Recreation State requirements for a special permit "to remove, treat, disturb, or destroy plants."

Page 3.4-17, revise the first paragraph as follows:

The proposed Dodger Stadium Station, may provide potentially suitable roosting habitat for individual and small groups of special-status bat species. Additionally, the overpass of SR-110 over Stadium Way occurs roughly 100 feet south-southeast of the proposed Stadium Tower, which could provide potentially suitable roosting habitat. The removal of certain trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. The magnitude of impacts to wildlife from tree removal depends on several factors, including the amount of habitat to be removed and the quality of that habitat. In the long-term, the impacts are also affected by the replacement plan for the removed trees.

The quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. Of the 26 tree species identified in the tree inventory report, 20 are considered non-native (and five of those are considered invasive). Furthermore, 122 of the 145 large trees (>8 inches DBH), and 71 of the 105 smaller trees, are non-

native species. All of the 57 native trees were planted as ROW trees (12 trees) or were planted as part of a plant program in the Los Angeles State Historic Park, and 34 of these 57 trees are young, with a DBH of <8 inches. Other areas are composed of 100-percent non-native trees, often covered in non-native and invasive vines such as Kudzu (*Pueraria montana*).

The only areas of tree removal that could be potentially described as wooded habitat are the following: the small grove of Fremont cottonwood trees at the western end of the Los Angeles State Historic Park, the non-native woodland at the Stadium Tower and associated fire buffer, and the non-native woodland at the Dodger Stadium Station location. The total area of wooded habitat that would be removed in each of these areas is 0.24, 1.02, and 0.39 acres, respectively. These areas are relatively small amounts of wooded habitat, relative to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park.

In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, the replacement of the 145 large trees proposed for removal with 242 new trees would more than offset any realized impacts associated with the proposed Project.

Page 3.4-18, revise the third paragraph as follows:

Therefore, with the implementation of Mitigation Measures BIO-A and BIO-B, construction of the proposed Project would have a less than significant impact on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Nevertheless, to provide additional environmental benefits related to bird nesting and bat maternity roosting, the proposed Project would incorporate BIO-PDF-G, requiring that tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

Page 3.2-19, revise the first full paragraph as follows:

During the daytime, resident birds or migrants using the habitat in the BSA would be able to visually detect and avoid colliding with the proposed stations, junction, towers, and cabins; however, they could collide with cable spans if the cables are more difficult to see and avoid. Compared to transmission lines, avian collisions with ropeway cables would be relatively unlikely, given that the cables would be 1.75 to 2.5 inches in diameter. By comparison, phase conductors on most transmission lines are 1 to 2 inches in diameter, while shield wires (the lines most associated with bird collisions on transmission lines because they are the highest wire and are smaller in diameter) range from 0.4 to 0.5 inch in diameter.[17] The proposed Project would lack this shield wire component, which would be expected to reduce (not increase) collision risk, relative to transmission lines with shield wires. In addition, the ropeway cables would be arranged in two groups of three cables (one group per direction of travel), and the three cables in each

group would be spaced between a few inches and a few feet apart in the vertical plane. Relative to typical vertical spacing of transmission lines (at least 6 feet apart to avoid electrocution hazard), these two groups of cables could essentially be considered to be on the same vertical plane, rather than spanning multiple wire levels, which would reduce collision risk. In addition, the proposed Project would include slack carriers, which are another design component that would increase the visibility of the cables to birds. Slack carriers are devices that support and maintain proper separation between the cables of 3S systems. Slack carriers are attached to the system's two stationary cables (the "track ropes") and provide support sheaves for the third cable that circulates continuously around the system (the "haul rope"). While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phases of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350-500 feet with adequate separation from the stations, junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane. Furthermore, the tight grouping of cables would be expected to make them more visible than one isolated cable the same size. Visibility of the cables would be further increased by the presence of moving cabins attached to them at regular intervals. The number of cabins passing over a given location along the alignment is expected to be 80 per hour during periods of low use, and 314 cabins per hour during Dodger games or events at Dodger Stadium. Furthermore, the windows on the cabins should not pose any collision risk to diurnal birds because they will be non-transparent (tinted), and partially covered with a vinyl window film, which would reduce reflectivity and increase visibility to birds. Overall, the larger diameter of the cables relative to wires on transmission lines, and grouping of multiple cables together on a single plane rather than dispersed across multiple planes, would likely result in a lower probability of avian collisions compared to that associated with transmission lines.

Footnote 8: Avian Power Line Interaction Committee. 2012. Reducing Avian Collisions with Power Lines: *The State of the Art in 2012*. Washington. D.C. Available at: http://www.aplic.org/uploads/files/15518/Reducing_Avian_Collisions_2012watermarkLR.pdf. Accessed April 2022.

Page 3.4-19, add the following after the first full paragraph:

With respect to nocturnal avian and bat collision risk, the proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet agl, whereas the proposed Project component heights are all below 200 feet agl.

Cable heights at:

- Alameda and Alpine Towers: 175 feet agl
- Stadium Tower: 159 feet agl
- All other stations/junction: 74 to 98 feet agl
- Tower heights: all are less than or equal to 195 feet

Indeed, structures below 200 feet agl contribute negligibly to overall annual bird mortality (Longcore et al. 2012), even in weather conditions with reduced cloud ceiling (USFWS March 2021). Further, as discussed below, these components located within an urban environment with many other obstacles of similar heights, and because avian flight during migration occurs at thousands of feet agl, the proposed Project components accordingly are not anticipated to contribute significantly to overall annual bird mortality.

Further, there are no natural migration concentration points near the proposed Project alignment. The Los Angeles River, which is approximately 0.5 mile east of the BSA is heavily impacted and is predominantly a concrete water-conveyance structure. The river corridor does not contain appreciable vegetation until it reaches more than 1 mile north of the proposed Project BSA. The Silver Lake Reservoir is more than 2 miles to the northwest. Waterbirds and other migrants may pass over the proposed Project en route to and from these locations, but there is no reason to believe the movement would be concentrated in the vicinity of the proposed Project (and below 200 feet agl) versus along alternate routes. Furthermore, direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment.

Furthermore, birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than (>) the highest-reaching proposed Project components, such as the towers, which would reach 478 to 584 feet above mean sea level (amsl), or the ropeway cables associated with those towers, which would reach 458 to 564 feet amsl. These obstacles include:

- Buildings less than (<) 1 mile west of the proposed Project alignment, in downtown Los Angeles, some of which reach more than 1,000 feet agl;
- A 230 kilovolt LADWP-owned transmission line runs roughly parallel to the proposed Project, along the Los Angeles River corridor, between 2,400 and 3,000 feet to the east, with approximately 120 to 155-foot-tall (agl) transmission towers reaching approximately 400 to 435 feet amsl;
- The radio tower on aptly named Radio Hill, 700 feet northeast of the Stadium Tower, which reaches 640 feet amsl;
- The eight sets of stadium lights atop Dodger Stadium, at the northern terminus of the alignment, which reach 665 to 680 feet amsl; and
- A 23-story (291-foot-tall) building, proposed for construction 400 feet west of the proposed Project alignment.

Page 3.4-21, revise the third paragraph as follows:

Therefore, Mitigation Measures BIO-A and BIO-B would be implemented to reduce any potentially significant indirect impacts to localized bird movement or native wildlife nursery sites, specifically for bat roosts and bird nests. Mitigation Measure BIO-A would require a field survey be conducted by a qualified bat biologist to determine the presence of colonial bat roosts within 100 feet of the

Project component sites prior to construction and tree removal at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites. Mitigation Measure BIO-B would require a pre-construction nesting survey be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present in or directly adjacent to the construction zone. In addition, standard construction practices related to the control of dust, noise, and vibration would also be implemented, as discussed in Threshold BIO-1. With implementation of Mitigation Measures BIO-A and BIO-B, impacts related to substantially interfering with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites during construction of the proposed Project would be reduced to a less than significant level. Therefore, impacts would be less than significant with the imposition of mitigation. Nevertheless, to provide additional environmental benefits related to local wildlife, the proposed Project would incorporate BIO-PDF-H, requiring that any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife.

Page 3.4-21, revise the last paragraph as follows:

Less Than Significant. As discussed under construction, natural vegetation communities or waterways are not present in the BSA. Operation of the proposed Project may include noise and increased human activity, especially near station locations and queuing areas. Given the urbanized nature of the BSA and limited amount of suitable foraging and nesting habitat, special-status birds and raptors are not expected to occur in the BSA, except potentially as transient migrants. However, because migration is not expected to be concentrated in the BSA, and the proposed Project would operate in urbanized and developed communities, migratory species are unlikely to be impacted by the relatively minor change in environment. Additionally, common species in the area are unlikely to be impacted by the relatively minor change in environment. As described above, concentrated avian migratory activity is not expected in or near the BSA, because the Project alignment is on a broad urbanized coastal plain and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat. Therefore, operation of the proposed Project would result in a less than significant impact related to substantially interfering with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites. Nevertheless, to provide additional environmental benefits related to the movement of birds, the proposed Project would incorporate BIO-PDF-B and BIO-PDF-C. BIO-PDF-B would require that the Project Sponsor, in coordination with and subject to the approval of CDFW, develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. BIO-PDF-C would require that the cabin windows be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight.

Page 3.4-22, add the following footnote to the first paragraph:

Less Than Significant Impact. A tree inventory report was prepared for the Project alignment, including the areas along the alignment between Project components.[19] Trees occurring along the

Project alignment were inventoried for species, size, and location. Based on field surveys conducted on April 24, 2021, and a review of the March 28, 2022 tree inventory report, 250 trees along the Project alignment are proposed for removal, and 10 trees that were inventoried would be preserved.

Footnote 19: Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022, tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 3.4-24, revise the second paragraph as follows:

The proposed Project would be required to adhere to the City's Street Tree policy regarding removal of street trees, which would occur in consultation with the Urban Forestry Division, as well as the California Department of Parks and Recreation's regulations concerning the removal of trees (14 CCR § 4306) if located on State property. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant. Nevertheless, to provide additional environmental benefits related to tree preservation, the proposed Project would implement BIO-PDF-E and BIO-PDF-F. BIO-PDF-E would require that trees scheduled for removal resulting from the proposed Project be inspected for contagious tree diseases and prohibit diseased trees from being transported from the Project site without treatment to avoid the spread of infectious tree diseases. BIO-PDF-F would require that the proposed Project comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including requirements under the City of Los Angeles, California Department of Parks and Recreation, and Caltrans.

Page 3.4-24, revise section 3.4.5, Project Design Feature as follows:

3.4.5 Project Design Features

BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan. The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:

(1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.

(2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.

(3) Annual reporting criteria and requirements.

BIO-PDF-C: Cabin Window Features. The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.

BIO-PDF-D: The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

BIO-PDF-E: Tree Disease Management. Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.

BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:

- City of Los Angeles:
    - "Protected" Trees: 4:1
    - Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
    - "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1)
- California Department of Parks and Recreation: At least 1:1
- Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1

BIO-PDF-G: Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

BIO-PDF-H: Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trashcans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

Page 3.4-25, revise the final paragraph as follows:

If roosting bats are determined present during the maternity season (April 15 through August 31), the three shall be avoided until after the maternity season, when the young are self-sufficient.

Page 3.4-26, revise the fifth paragraph as follows:

Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal.

SECTION 3.05 CULTURAL RESOURCES

In addition to the general additions and corrections provided above, revise Section 3.05, Cultural Resources, as follows:

Pages 3.5-6 through 3.5-62, revise eleven references to the Chinatown/State Park Station as follows:

Chinatown/State ~~Historic~~ Park Station

Page 3.5-63, revise as follows:

CUL-3: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Construction Impacts

Less Than Significant Impact With Mitigation. Construction of the proposed Project would require excavation at the Project component sites, which is anticipated to reach a maximum depth of 10 feet, except at the proposed Dodger Stadium Station where the maximum depth would be 42 feet. Piles for the proposed stations, towers, and junction would be drilled to a max depth of 125 feet.

Resource 19-001575 is a large multicomponent archaeological site located around LAUS. During the construction of the MWD Headquarters building in 1999, approximately 500 feet southeast of the Area of Direct Impacts, a prehistoric and contact period cemetery included at least 14 internments, 5 cremations, and scatters of human remains as well as associated artifacts were encountered. The resource boundaries are roughly coterminous with the LAUS property boundary. A portion of the Area of Direct Impacts for the proposed Alameda Station overlaps site Resource 19-001575. However, because the Native American cemetery is located approximately 500 feet east of the Area of Direct Impacts, the known cemetery is not anticipated to be impacted by construction. Nonetheless, due to the sensitivity of the of the area, Mitigation Measure CUL-~~F~~D, archaeological testing and data recovery plan for Resource 19-001575, would be prepared and implemented to reduce impacts related to human remains to less than significant.

Additionally, three previously recorded resources (19-001112, 19-004218, 19-167106) within an eighth mile of the Area of Direct Impacts have known cemeteries. None of these resources are located within or adjacent to the Area of Direct Impacts.

The proposed Project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 which requires that work be suspended in the immediate vicinity of the discovery and the Los Angeles County Coroner be contacted. If the remains are deemed to be Native American in origin, the County Coroner will contact the Native American Heritage Commission (NAHC), which will identify a Most Likely Descendant pursuant to PRC Section 5097.98 and CCR Section 15064.5. Work may be resumed at the landowner's discretion, but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the Project while consultation and treatment are conducted. With implementation of Mitigation Measure CUL-D and compliance with the California Health and Safety Code and PRC outlined above, construction impacts related to human remains for the proposed Project would be less than significant.

Page 3.5-64, revise as follows:

CUL-PDF-A Pre-Construction Documentation of The Winery. Prior to the~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.

Page 3.5-65, revise as follows:

CUL-PDF-C Pre-Construction Documentation. Prior to the~~or~~ issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.

Pages 3.5-68 to 3.5-69, revise as follows:

MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park."

Specifically, the CRMMP shall be applicable to all ground disturbance activities extending into native soils within known archaeological sites and other areas of high sensitivity. Excavations within or within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground disturbing activities in native soils within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, tTreatment may include implementation of archaeological data recovery excavations to remove the resource ~~or preservation in place~~. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting.

If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with

permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC.

For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal.

MM-CUL-B: Archaeological Resources Worker Training Program. To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and LASHP staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by LASHP and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.

MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station). To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will therefore also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.

The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location,

integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed.

If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt. To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery.

If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavation**s** and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

Page 3.5-71, revise as follows:

3.5.7 Level of Significance after Mitigation

Upon implementation of Mitigation Measures VIB-A and VIB-B, potentially significant impacts related to the historical resource, the *El Grito (The Cry)* Mural, the Los Angeles Plaza Historic District, and The Winery, would be reduced to less than significant under the proposed Project.

Upon implementation of Mitigation Measures CUL-A through CUL-F, potentially significant impacts related to archaeological resources would be reduced to less than significant under the proposed Project.

Upon implementation of Mitigation Measure CUL-~~A~~D, potentially significant impacts related to human remains would be reduced to less than significant under the proposed Project.

SECTION 3.06 ENERGY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.07 GEOLOGY AND SOILS

In addition to the general additions and corrections provided above, revise Section 3.07, Geology and Soils, as follows:

Page 3.7-8, add the following footnote to the second paragraph:

The fault closest to the Project site is the Elysian Park fault. According to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment.[19] The Upper Elysian Park fault is a north-to-northeast–dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture, and therefore is not subject to the conditions of the Alquist-Priolo Act. The Elysian Park thrust fault is considered to be seismogenic (capable of generating earthquakes) from a depth of approximately 2 miles below ground surface in the south-southwest, to approximately 10 miles below ground surface in the north-northeast.

Footnote 19: U.S. Geological Survey, 2020, Quaternary Fault and Fold Database for the Nation, accessed September 2022, at https://doi.org/10.5066/P9BCVRCK.

SECTION 3.08 GREENHOUSE GAS EMISSIONS

In addition to the general additions and corrections provided above, revise Section 3.08, Greenhouse Gas Emissions, as follows:

Page 3.8-17, revise the first paragraph as follows:

The Project is proposed to be powered by renewable energy, and provide safe, environmentally friendly, and high-capacity transit connectivity in the Project area. Operation of the proposed Project would result in electricity demand for the aerial gondola system, as well as energy needed for complementary components such as station lighting, restrooms, and escalators. GHG emissions from electricity use are based on anticipated sources of power. The Project would obtain power through renewable electricity from LADWP's Green Power Program, as described in GHG-PDF-A. Renewable electricity sources are assumed to have zero GHG emissions (e.g., the gondola operations would be powered by renewable electricity from LADWP's Green Power Program). Other sources not powered by renewable electricity, such as the electricity usage by the Los Angeles State Historic Park amenities at the Chinatown/State Park Station, would result in a small amount of GHG emissions. These amenities would be operated by the Los Angeles State Historic Park. Additionally, the proposed Project would feature battery storage as a backup power

supply to allow for unloading of the aerial gondola system in the event of a temporary power grid failure, which would require several hours per year of maintenance.

Page 3.8-18, revise the last paragraph as follows:

As described previously, the Project is proposed to be powered by renewable electricity, and provide safe, environmentally friendly, and high-capacity transit connectivity in the Project area. In addition, as noted in Appendix C of the *Los Angeles Aerial Rapid Transit Greenhouse Gas Emissions Technical Report*, the proposed Project would be consistent with all applicable GHG reduction plans, policies, and regulations. Implementation of the proposed Project would result in a net decrease of GHG emissions as an innovative transportation alternative that would reduce VMT and emissions compared to existing conditions. The electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources as supplied by the LADWP's Green Power Program, as described in GHG-PDF-A. The proposed Project would incorporate energy-efficient features, such as open-air stations and high efficiency lighting. The proposed Project would meet the CALGreen Code to the extent practicable, and would include water-efficient restroom features and drought-tolerant landscaping. In addition, at least 65 percent of the construction waste from the proposed Project will be salvaged for reuse, recycled, or diverted from landfills. The proposed Project would provide transportation alternatives consistent with local, regional, and statewide policies to reduce traffic, air pollution, and GHGs by reducing VMT.

Page 3.8-19, revise sections 3.8.5 through 3.8.7 as follows:

3.8.5 ~~Mitigation Measures~~ Project Design Feature

GHG-PDF-A: Green Power. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.

3.8.6 Mitigation Measures

The proposed Project would result in less than significant impacts related to GHG emissions. No mitigation measures are required.

3.8.~~6~~7 Level of Significance after Mitigation

The proposed Project would result in less than significant impacts related to GHG emission.

SECTION 3.09 HAZARDS AND HAZARDOUS MATERIALS

In addition to the general additions and corrections provided above, revise Section 3.09, Hazards and Hazardous Materials, as follows:

Page 3.9-23, revise the fourth paragraph as follows:

This residual contamination may be encountered during excavation and construction activities for the Alameda Station, which has the potential to create a significant hazard to the public or the

environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A, requiring preparation and submittal to the Los Angeles Department of Building and Safety (LADBS) of a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Alameda Station to less than significant.

Page 3.9-24, revise the first and second paragraphs as follows:

Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Chinatown/State Park Station to less than significant. Furthermore, it is not anticipated that the groundwater monitoring wells in the Los Angeles State Historic Park property would be restricted during construction activities of the Chinatown/State Park Station; the wells would remain accessible during and after construction activities as required for the RWQCB's annual groundwater monitoring program.

Construction of the Broadway Junction at the 1201 North Broadway property would have a maximum excavation depth of 7 feet bgs and the maximum depth of drilled piles is 120 feet below pile depth. As discussed in Section 3.9.2, Environmental Setting, the 1201 North Broadway property was formerly occupied by an automotive dealership from 1924 until 2003. Previous testing and studies conducted for the 1201 North Broadway site indicate that residual petroleum hydrocarbons may still exist in soils at the 1201 North Broadway property in the area of the former hydraulic lifts and gasoline UST. Excavation or earthwork would occur in the area of the former lifts; therefore, there is potential to encounter contaminated soils during construction activities, which has the potential create a significant hazard to the public or the environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Broadway Junction to less than significant.

Page 3.9-30, revise the second paragraph as follows:

The Broadway Junction would be constructed within the 1201 North Broadway property, which is listed in multiple hazardous materials database listings, because the site was formerly occupied by an automotive dealership from 1924 until 2003. As discussed in Threshold HAZ-1, previous testing and studies conducted for the 1201 North Broadway site indicate that residual petroleum hydrocarbons may still exist in soils in the area of the former hydraulic lifts and gasoline UST. Excavation or earthwork would occur in the area of the former lifts; therefore, there is potential to encounter contaminated soils during construction activities, which has the potential create a

significant hazard to the public or the environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Broadway Junction to less than significant.

Page 3.9-46, revise section 3.9.5, Mitigation Measures as follows:

The proposed Project would implement the following mitigation measures to reduce impacts related to hazards and hazardous materials.

MM HAZ-A **Prepare a Soil and Groundwater Management Plan**: The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment.

This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

SECTION 3.10 HYDROLOGY AND WATER QUALITY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.11 LAND USE AND PLANNING

In addition to the general additions and corrections provided above, revise Section 3.11, Land Use and Planning, as follows:

Page 3.11-10, revise to add the following after the third paragraph:

El Pueblo de Los Angeles General Plan

The City of Los Angeles signed an agreement in 1953 with the County of Los Angeles and State of California creating El Pueblo State Historic Park. This agreement allowed the State to purchase most of the property comprising the park. In cooperation with the City and County, in 1980, the State prepared the El Pueblo General Plan to provide guidelines for the preservation, rehabilitation, and interpretation of the historic buildings as well as for new development within the park. The purpose of the general plan is to provide general guidelines for management, interpretation, and development of El Pueblo de Los Angeles State Historic Park. In 1992, the property within the Park was transferred to the City; in 1994, a separate department was created, and the name was changed to El Pueblo de Los Angeles Historical Monument (El Pueblo)[90].

The Land Use and Facilities Element of the El Pueblo General Plan contains the following goals and objectives:

1) To unify and coordinate the structures and open spaces to form an entity identifiable as a state historic park.
2) To establish a recommended sequence for park development, prioritizing projects and providing specific tools for their implementation.
3) To present and interpret the eras and activities of El Pueblo's history within the current physical setting.
4) To balance and provide a blend of cultural and commercial services in the park.
5) To develop an integrated and comprehensive program of historical interpretation.
6) To promote and maintain a special congregating place for Hispanic groups, and for interaction among all ethnic groups.
7) To develop a strong connection with other downtown centers.
8) To resolve vehicle circulation and parking problems, eliminating conflicts with pedestrians and vehicles in the historic area.
9) To create an identifiable park, with clear entrances and orientation, a clear image, and clear boundaries.
10) To provide the public with necessary conveniences and services.
11) To provide park-like relief against the backdrop of downtown.

The proposed Project's Alameda Station's construction activities would occur within the El Pueblo General Plan boundaries. Construction of the proposed Project would involve the installation of circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo, in an area currently designated as ROW containing a parking and loading area for El Pueblo. With regard to the area of the El Pueblo General Plan where the proposed Project would be located, the General Plan states:

1) The relationship and connection from the Plaza Substation to Placita de Dolores should be studied and improved.

2) The transition between the Plaza and Placita de Dolores needs special design attention.

3) To successfully relate El Pueblo to Union Station [Los Angeles Union Station, LAUS], pedestrian crossings should be studied.

4) Improvements to Placita de Dolores for expanded function, landscaping, and connections with other site areas are recommended. This should be coordinated with the development of the Plaza Substation and its facade restoration, as well as with the designs for possible connection to Union Station.

5) Strong design relationships should be established between the Plaza, Placita de Dolores, Father Serra Park, and possible linkage to Union Station.[91]

Footnote 90: El Pueblo de Los Angeles State Historic Park General Plan, California Department of Parks and Recreation. August 1981.

Footnote 91: City of Los Angeles, 1980, El Pueblo General Plan.

Page 3.11-37, revise the second paragraph as follows:

Additionally, the proposed Project would include a number of pedestrian enhancements and ~~a~~ mobility hubs that would provide new multi-modal connection options. ~~For instance,~~ Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements at this location could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Additionally, the ~~Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the~~ Dodger Stadium Station would ~~to~~ include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for ~~Consideration as to the mobility hub include securing~~ Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection.

Page 3.11-44, revise the second paragraph in Table 3.11-2 as follows:

Additionally, ~~the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the~~ Dodger Stadium Station will ~~to~~ include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for ~~Consideration as to the mobility hub include securing~~ Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year.

Page 3.11-45, revise the second paragraph in the "Goal 4" row of Table 3.11-2 as follows:

Additionally, ~~the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the~~ Dodger Stadium Station will ~~to~~ include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for ~~Consideration as to the mobility hub include securing~~ Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating.

Page 3.11-49, revise the second paragraph of Table 3.11-3 as follows:

Additionally, ~~the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the~~ Dodger Stadium Station will ~~to~~ include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for ~~Consideration as to the mobility hub include securing~~ Dodger Stadium and the surrounding surface parking areas.

Page 3.11-55, revise the paragraph in the "Goal 10" row of Table 3.11-3 as follows:

Additionally, ~~the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the~~ Dodger Stadium Station will ~~to~~ include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for ~~Consideration as to the mobility hub include securing~~ Dodger Stadium and the surrounding surface parking areas.

Page 3.11-61, add the following before the "Specific Plan Areas" heading:

El Pueblo General Plan

The proposed Project's Alameda Station's construction activities would occur within the El Pueblo General Plan boundaries. Construction of the proposed Project would involve the installation of

circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo. El Pueblo currently attracts many visitors to its many historic features, including Olvera Street, which is a pedestrian-oriented marketplace containing restaurants, craft shops, and other retail businesses reflecting the Mexican heritage of the City. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The Alameda Station location was selected because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access. In addition, the proposed Project would provide an intermediate station at the southernmost entrance at the Los Angeles State Historic Park, providing access to Chinatown and the Los Angeles State Historic Park, consistent with the El Pueblo General Plan's aim to study connections to Chinatown from El Pueblo.[92]

The proposed Project would be consistent with the goals and objectives of the El Pueblo de Los Angeles General Plan as discussed below in Table 3.11-7.

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
1. To unify and coordinate the structures and open spaces to form an entity identifiable as a state historic park.	**Consistent.** Operation of the proposed Project would not impede existing accessible areas or visitor uses or activities within the El Pueblo General Plan area, but rather would provide a new pedestrian plaza at El Pueblo, encouraging visitors to El Pueblo, which would help unify and coordinate the area's structures and open spaces. The proposed Project, as a first/last mile transit connection, would provide a link to and from the open and public spaces at El Pueblo and LAUS to other such open spaces along the alignment, including the Los Angeles State Historic Park, Elysian Park, and other pedestrian-oriented areas of Chinatown. With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. Rather than proposing a single uniform color palette for the entire system, colors for the material finishes at each station and junction will be selected to be complementary to each of their respective sites and surrounding urban fabric. In addition, each station including Alameda Station would provide an

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	opportunity for site specific artwork that is reflective of the unique neighborhood culture that could be commissioned from local artists. Therefore, the proposed Project would be consistent with this goal/objective.
2. To establish a recommended sequence for park development, prioritizing projects and providing specific tools for their implementation.	This goal/objective is not applicable to the proposed Project. Nevertheless, the proposed Project would not impede development in the El Pueblo General Plan Area, as construction of the proposed Project within the Plan boundaries would only involve the installation of circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo.
3. To present and interpret the eras and activities of El Pueblo's history within the current physical setting.	**Consistent.** The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El Pueblo. Therefore, the proposed Project would be consistent with this goal/objective.
4. To balance and provide a blend of cultural and commercial services in the park.	**Consistent.** The proposed Project would provide numerous benefits to local businesses in the El Pueblo area. In addition to providing accessible and affordable mobility options for these businesses' employees and area residents, the proposed Project would create economic opportunities for potential partnerships with these businesses. The proposed Project could partner, for example, with El Paseo Inn Restaurant and the Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses. The proposed Project includes other features to enhance and provide additional benefit to the surrounding community, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs,

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The proposed Project would provide links to and from El Pueblo and the LAUS transit hub via Alameda Station, capitalizing on opportunities to connect the area around the Alameda Station to other local and regional transit opportunities, historic resources, and cultural facilities along the Project alignment, including Chinatown and the Los Angeles State Historic Park, as well as Dodger Stadium, thereby increasing access to existing commercial and cultural uses. In addition, with Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. Therefore, the proposed Project would be consistent with this goal/objective.
5. To develop an integrated and comprehensive program of historical interpretation. 6. To promote and maintain a special congregating place for Hispanic groups, and for interaction among all ethnic groups.	**Consistent.** The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	Pueblo. Accordingly, the proposed Project would support the goal of developing a comprehensive program of historical interpretation. In addition, the proposed Project would provide links to and from El Pueblo and the LAUS transit hub via Alameda Station, capitalizing on opportunities to connect the area around the Alameda Station to other local and regional transit opportunities, historic resources, and cultural facilities along the proposed Project alignment, including Chinatown and the Los Angeles State Historic Park, as well as Dodger Stadium, a regional event center. With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. In addition, each station, including Alameda Station, could also provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. Therefore, the proposed Project would be consistent with these goals/objectives of developing a historical interpretation program and promoting and maintaining a special congregating place for Hispanic groups, and for interaction among all ethnic groups.
7. To develop a strong connection with other downtown centers.	**Consistent.** The proposed Project would develop a strong connection between El Pueblo and other downtown centers through providing an ART system within urbanized downtown Los Angeles. The proposed Project would provide direct linkages for existing residents and communities to various areas of downtown Los Angeles, including El Pueblo (and the Los Angeles Plaza Park, Placita de Dolores, and the adjacent Olvera Street); Los Angeles State Historic Park; Dodger Stadium; and Elysian Park. The proposed Project would provide a connection to and from El Pueblo via Alameda Station, providing new and enhanced connections from the El Pueblo area with downtown areas including LAUS, Dodger Stadium, the

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	Chinatown/State Park and other local transit lines along the Project alignment and the regional transit system. Additionally, the Alameda Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. By providing expanded transit access to neighborhoods and activity centers, the proposed Project would provide additional opportunities for recreational use for a broad cross-section of visitors and the surrounding neighborhoods. Therefore, the proposed Project would be consistent with this goal/objective.
8. To resolve vehicle circulation and parking problems, eliminating conflicts with pedestrians and vehicles in the historic area.	**Consistent.** The proposed Project would provide a proven, safe, zero emission, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector between LAUS, El Pueblo and Dodger Stadium. At Alameda Station, the proposed Project would install circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo, in an area currently designated as ROW containing a parking and loading area for El Pueblo. The proposed Project's pedestrian network improvements would assist in minimizing circulation challenges by facilitating multi-modal access to and from both the proposed Project's Alameda Station and LAUS, while also replacing an existing parking lot with pedestrian improvements to further eliminate conflicts with pedestrians and vehicles in the area. The proposed Project would include multilingual signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, as well as directional and pedestrian signage adjacent to and throughout the proposed Project as necessary to facilitate access and safety, which would be illuminated in conformance with all applicable requirements of the Los Angeles Municipal Code. As described further in Section 3.17, Transportation, the proposed Project would

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	not substantially increase hazards (e.g., vehicle, pedestrian, and bicycle safety hazards) due to a geometric design feature or incompatible use with implementation of mitigation, and therefore would not result in conflicts with pedestrians and vehicles in the area. In addition, the proposed Project would include a parking management plan prepared in collaboration with the City, who would implement any on-street parking management strategies, and with robust feedback from community stakeholders to inform development of the plan. Therefore, the proposed Project would be consistent with this goal/objective.
9. To create an identifiable park, with clear entrances and orientation, a clear image, and clear boundaries.	**Consistent.** The proposed Project would integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the proposed pedestrian plaza at El Pueblo. The Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project's new pedestrian plaza at El Pueblo assists with this goal by creating a new, identifiable pedestrian entry point to El Pueblo in an area that currently contains a parking and loading area for El Pueblo. The proposed Project's signage would provide directional and pedestrian signage placed adjacent to and throughout the proposed Project to facilitate access and safety, including at Alameda Station adjacent to El Pueblo, to improve wayfinding. Therefore, the proposed Project would be consistent with this goal/objective.

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
10. To provide the public with necessary conveniences and services.	**Consistent.** The proposed Project would provide a proven, safe, zero emission, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector between the activity centers at LAUS, El Pueblo and Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, Echo Park, and Solano Canyon, thus providing the public with an additional transit option in the area. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, and would therefore enhance access to El Pueblo and promote and further attract visitors to Olvera Street. Therefore, the proposed Project would be consistent with this goal/objective.
11. To provide park-like relief against the backdrop of downtown.	**Consistent.** The Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. The proposed Project would integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would enhance visitor use and experiences within this area. Therefore, the proposed Project would be consistent with this goal/objective.
Policies Related to the Proposed Project Location within the El Pueblo General Plan	
• The relationship and connection from the Plaza Substation to Placita de Dolores should be studied and improved. • The transition between the Plaza and Placita de Dolores needs special design attention.	The majority of these policies are related to the development of the El Pueblo General Plan which was developed in 1980 and are not applicable to the proposed Project. Nevertheless, the proposed Project would be supportive of these goal/objectives. The proposed Project would integrate physical and visual connections between the proposed new Alameda Station and El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would enhance visitor use and experiences within this area, and would improve the

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
• To successfully relate El Pueblo to Union Station [Los Angeles Union Station, LAUS], pedestrian crossings should be studied. • Improvements to Placita de Dolores for expanded function, landscaping, and connections with other site areas are recommended. This should be coordinated with the development of the Plaza Substation and its facade restoration, as well as with the designs for possible connection to Union Station. • Strong design relationships should be established between the Plaza, Placita de Dolores, Father Serra Park, and possible linkage to Union Station.[93]	relationship and connection from the Plaza Substation to Placita de Dolores and assist with the transition between the Plaza and Placita de Dolores. With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo, expanding visitor uses, and would also connect any passenger of the ART system to Dodger Stadium, a regional event center. In addition, the proposed Project is designed to be consistent with Metro's LAUS Forecourt and Esplanade Improvements Project, which involves repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. Accordingly, in conjunction with the LAUS Forecourt and Esplanade Improvements Project, the proposed Project's pedestrian improvements would assist with pedestrian crossings in order to relate El Pueblo to LAUS. Therefore, the proposed Project would be consistent with these goals/objectives.

Source: California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

Footnote 92: El Pueblo General Plan, p. 59.

Footnote 93: City of Los Angeles, 1980, El Pueblo General Plan.

SECTION 3.12 MINERAL RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.13 NOISE

In addition to the general corrections and additions provided above, revise Section 3.13, Noise, as follows:

Pages 3.13-72 to 3.13-43, revise Mitigation Measure VIB-A as follows:

VIB-A: **Vibration Monitoring:** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:

- Vibration Monitoring Equipment: the placement of vibration monitoring equipment ~~at least~~ approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices.
- Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.

SECTION 3.14 POPULATION AND HOUSING

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.15 PUBLIC SERVICES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.16 PARKS AND RECREATIONAL FACILITIES

In addition to the general additions and corrections provided above, revise Section 3.15, Parks and Recreational Facilities, as follows:

Page 3.16-16, revise the last paragraph as follows:

> Construction of the Chinatown/State Park Station would temporarily fence off portions of the park, generate dust and noise, and introduce heavy construction equipment into the area, which may potentially discourage people from using certain portions of the park, disrupt events occurring at the park, or increase the use of the open portions of the park. <u>The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms during construction; however, the Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction.</u> In addition, during one of the final phases of construction, the overhead ropeway cables of the ART system would be installed, which would require a brief and temporary closure of the southernmost corner and western edge of the Los Angeles State Historic Park beneath the cables for safety purposes. However, other options for pedestrian access, including the provision of pedestrian detours during construction, would allow for continued pedestrian access within the Project area. In the location of the Chinatown/State Park Station, a covered pedestrian sidewalk on the roadway would be provided to maintain pedestrian access during all phases of construction, with the exception of 10 nonconsecutive days of asphalt/restriping that would occur on the existing southbound parking lane. In addition, the eastern sidewalk on Spring Street would remain open for pedestrian access at all times.

Page 3.16-26, revise the second sentence of the second paragraph as follows:

> As described in PR-1, construction of the Chinatown/State Park Station would require the temporary closure of approximately ~~2~~2 acres of the southern entrance to Los Angeles State Historic Park and the southernmost corner and western edge of the park during cable installation.

Page 3.16-21, revise the third paragraph as follows:

> The proposed Project would include a ~~potential~~ mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the ~~potential~~ effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not change the existing use and capacity of Elysian Park as the park is the second largest park in the City of Los Angeles, spanning 575 acres. It is not anticipated that operation of the proposed Project would result in substantial physical deterioration of the Elysian Park by providing access to the park, as the park is underutilized and the proposed Project does not propose housing units that would otherwise increase the population of the area. Instead, the proposed Project would improve the mobility and accessibility for people in the area by providing an ART option, in accordance with several community plans, including the City of Los Angeles General Plan, Silver Lake-Echo Park-Elysian Park Community Plan, and Metro's Transit to Parks Strategic Plan, to increase access to the park. Therefore, the proposed Project would not increase the use of Elysian Park to the extent that substantial physical deterioration of the facility would occur or be accelerated, and the operational impact would be less than significant impacts.

Page 3.16-24, revise the last paragraph as follows:

> The Dodger Stadium Station would ~~potentially~~ include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. As described above, the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the beneficial effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not create or expand the existing use and capacity of Dodger Stadium or Elysian Park. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would be located within the boundaries of Dodger Stadium parking lot. Therefore, operational impacts of Dodger Stadium Station related

to the construction of expansion of recreational facilities which might have an adverse physical effect on the environment would be less than significant.

Page 3.16-29, revise the first full paragraph as follows:

Operation of Dodger Stadium Station would not require the provision of new or physically altered government facilities (i.e., parks), or need for new or physically altered parks. The proposed Project would ~~potentially~~ provide a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, including a bike share program and individual bike lockers, and connections to Elysian Park and adjacent neighborhoods. As such, the proposed project would result in beneficial impacts related to Elysian Park. Elysian Park is located in the Silver Lake-Echo Park-Elysian Park Community Plan Area. One of the goals of the Community Plan is to provide/ensure access to new recreational resources and open space developed throughout the Plan area, including trails and facilities along the Los Angeles River, and new parks. The proposed Project would improve the mobility and accessibility for existing residents and communities in the area by providing direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, and Dodger Stadium. Therefore, operation of Dodger Stadium Station would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives, and the impact would be less than significant.

SECTION 3.17 TRANSPORTATION

In addition to the general additions and corrections provided above, revise Section 3.17, Transportation, as follows:

Page 3.17-26, revise the first paragraph as follows:

The proposed Project would provide fixed route transit service to several neighborhoods including Chinatown, Mission Junction, Elysian Park and Solano Canyon, and to destinations around the Los Angeles State Historic Park. Ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis. The <u>proposed</u> Project <u>would</u> ~~Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station to~~ include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options; accordingly, a one-mile biking distance for the Dodger Stadium Station was chosen for the evaluation of the Dodger Stadium Station since the ~~potential~~ mobility hub would facilitate safe and convenient connections to Elysian Park and Solano Canyon, which are beyond a half-mile walking distance. The American Community Survey and the Longitudinal Employer-Household Dynamics of the United States Census was used to calculate the population and jobs respectively within the station catchment areas.

Page 3.17-39, revise the first paragraph as follows:

> **Less than Significant Impact with Mitigation.** Per the City of Los Angeles TAG, construction impacts are not considered to be part of the CEQA analysis, and so are included for informational purposes. Nonetheless, Project construction would introduce lane closures and closed worksites within City streets for construction activities, such as foundations and steel erection. Construction worksites would be fenced, and lane closures and associated lane tapers, temporary advance warning signs, detour signs, etc., would be implemented in accordance with the California MUTCD and LADOT requirements to ensure that no significant temporary geometric design hazards are introduced during the construction period after mitigation. Construction of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use with implementation of Mitigation Measure TRA-B, as presented in Section 3.17.~~5~~6, Mitigation Measures, below. As these features are constructed, Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below would be implemented concurrently to ensure that these impacts would be less than significant during construction.

Page 3.17-40, revise the first paragraph as follows:

> No pedestrian crossings would occur across City streets via this connection. One driveway crossing would be along this pedestrian connection. Enhancements to this driveway crossing are detailed under Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below. Therefore, the proposed Project would not hinder pedestrian access or crossings. In order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-41, revise the fourth paragraph as follows:

> Implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, primarily by implementing westbound no right turn on red restrictions would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a ~~westbound~~ right turn on red from westbound Alhambra Avenue to northbound Alameda Street. With implementation of Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, impacts would be less than significant.

Page 3.17-42, revise the second paragraph as follows,

> Because the columns would be set back from the roadway, pedestrians crossing in the crosswalk across the existing driveway immediately south of the Los Angeles State Historic Park would be fully visible to vehicles turning into the existing driveway, and no sight distance obstructions would be present. Vehicles exiting the driveway would have full view of pedestrians crossing without obstructions. Pedestrians who cross outside of the crosswalk to the west of the columns could be obstructed by the columns for motorists travel~~l~~ing southbound on Spring Street making a right turn into the driveway. While there is an existing paved pathway behind the proposed

column locations north of the driveway to access the Los Angeles State Historic Park, south of the driveway is a parking drive aisle of the Capital Milling property. Pedestrians are unlikely to cross in that location, because there would not be a sidewalk to cross onto south of the driveway. However, to further limit the potential for pedestrians to cross behind the columns, implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelize~~ation of~~ pedestrians to the crosswalk, would alleviate potential visibility issues associated with operation of the Chinatown/State Park Station by preventing pedestrians from crossing behind the columns where they would not be visible to motorists. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-~~43~~, revise the last paragraph as follows:

The section above details the Project components and their potential to affect vehicle, pedestrian, and bicycle visibility, which is the primary way that the Project could negatively impact transportation conditions. Though as detailed above, visibility enhancements have been proposed under Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, at the Alameda Tower and Chinatown/State Park Station to reduce the potential for impact to less than significant.

Page 3.17-44, revise the first sentence of the fifth paragraph as follows:

The proposed Project's junction and towers would not introduce any unsafe physical conditions with the implementation of Mitigation Measure TRA-A, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, which would be implemented at the Alameda Tower and the Chinatown/State Park Station.

Page 3.17-58, revise the last sentence of the fourth paragraph as follows:

Nonetheless, implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities to ensure that the impact is less than significant with mitigation incorporated.

Page 3.17-66, revise the seventh paragraph as follows:

Implementation of Mitigation Measure TRA-C, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, includes the identification of temporary disaster routes during construction and other traffic handling measures during a disaster, would be required. With implementation of Mitigation Measures TRA-B and TRA-C, as presented in Section 3.17.~~5~~6, Mitigation Measures, below, construction impacts would be less than significant.

Page 3.17-67, revise sections 3.17.5 and 3.17.6 as follows:

3.17.5 Project Design Feature

TRA-PDF-A Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

3.17.5~~5~~6 Mitigation Measures

MM TRA-A **Visibility Enhancements:** Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at ~~for~~ the following locations~~ sufficient to alert drivers to the presence of pedestrians~~:

- Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street.
- Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks.

  ~~Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing.~~ The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.

MM TRA-B **Construction Traffic Management Plan:** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination

will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations.
- Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary.
- As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods.
- Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction.
- Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

- Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project ~~bimonthly~~, or as otherwise determined appropriate by City Staff.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

Page 3.17-69, revise section 3.17.6 as follows:

3.17.~~6~~7 Level of Significance After Mitigation

SECTION 3.18 TRIBAL CULTURAL RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.19 UTILITIES AND SERVICE SYSTEMS

In addition to the general additions and corrections provided above, revise Section 3.19, Utilities and Service Systems, as follows:

Page 3.19-21, revise the fifth paragraph as follows:

Additionally, operation of the proposed Project would require connections to the LADWP power grid through installation of permanent, underground power lines to connect conduit from the proposed Project to existing underground electrical vaults in order to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). It is estimated that the Aerial Rapid Transit (ART) system would require a total estimated power requirement of approximately 2.5 MW to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by the LADWP through the utility's Green Power Program, as described in GHG-PDF-A in Section 3.8, Greenhouse Gas Emissions. Accordingly, the primary electricity usage associated with the Project would come

from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. Therefore, it is not anticipated that operation of the proposed Project would result in the construction of new or expanded electric power facilities. For a detailed description of energy demand and conservation, refer to Section 3.6, Energy of this Draft EIR.

SECTION 3.20 WILDFIRE

In addition to the general corrections and additions provided above, revise Section 3.20, Wildfire, as follows:

Page 3.20-30, revise the last full paragraph as follows:

It is noted that the proposed Project would implement Mitigation Measure TRA-~~3~~C, requiring the development of a Project-specific temporary disaster route plan prior to the start of construction, as described in Section 3.17, Transportation, which would further support coordination with local authorities during an emergency event. The temporary disaster route plan would require coordination with and approval of the plan by LADOT, which would include street closure information and detour plans. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation.

SECTION 4.0 ALTERNATIVES

In addition to the general additions and corrections provided above, revise Section 4.0, Alternatives, as follows:

Page 4-1, revise Section 4.1.1, Project Impacts, as follows:

Based on the environmental analysis conducted for the proposed Project, significant impacts requiring mitigation have been identified for:

- Section 3.4, Biological Resources
- Section 3.5, Cultural Resources
- Section 3.7, Geology and Soils
- Section 3.9, Hazards and Hazardous Materials
- Section 3.11, Land Use and Planning
- Section 3.13, Noise
- Section 3.15, Public Services
- Section 3.17, Transportation
- Section 3.18, Tribal Cultural Resources
- Section 3.19, Utilities and Service Systems
- ~~Section 3.20, Wildfire~~

The Draft EIR identifies less than significant impacts for:

- Section 3.1, Aesthetics
- Section 3.2, Agriculture and Forestry Resources

- Section 3.3, Air Quality
- Section 3.6, Energy
- Section 3.8, Greenhouse Gas Emissions
- Section 3.10, Hydrology and Water Quality
- Section 3.14, Population and Housing
- Section 3.16, Parks and Recreation
- Section 3.20, Wildfire

Page 4-6, revise the second paragraph as follows:

4.1.3.5 Objective 5: Reduce Transportation Related Pollution and GHG Emissions

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing an ART system that would provide safe, zero emission, and high-capacity transit connectivity. Current vehicular emissions associated with events at Dodger Stadium result from passengers in vehicles traveling to the game along with employees (i.e., total Vehicle Miles Traveled (VMT)). By transitioning the passengers of these vehicles to the proposed Project or Spring Street Alignment Alternative, total VMT would be reduced along with corresponding reductions in transportation related pollution and GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The TSM Alternative would moderately meet this objective, because while more passengers would transition from private vehicles to DSE buses, which could potentially be electrified in the future, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The No Project Alternative would not meet this objective, as it would not reduce vehicular congestion that would result in a reduction in transportation related pollution and GHG emissions.

Page 4-8, revise the first full paragraph as follows:

4.1.3.12 Objective 12: Provide a Sustainable Form of Transit

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing a sustainable ART system that would provide safe, zero emission, and high-capacity transit connectivity. Both the proposed Project and Spring Street Alignment Alternative would obtain power through renewable electricity, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. The TSM Alternative and No Project Alternative would not meet this objective at this time, as neither alternative would provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. With respect to the TSM Alternative, while Metro has made significant progress in transitioning to a zero-emission bus service, an April 20, 2023 Metro report extended the deadline for transitioning the Metro bus fleet to zero-emission buses from 2030 to 2035, indicating that Metro would not be able to operate the TSM Alternative with zero-emission buses by the proposed Project's projected opening year. Further, unlike the proposed Project, which has committed to purchase

the power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources.

Page 4-18, add the following new Section 4.2.1.2:

Pedestrian Enhancement Alternative

Under the Pedestrian Enhancement Alternative, the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative would use the existing pedestrian path between the Mero L Line (Gold) Station and Dodger Stadium along College Street to Yale Street and over the existing pedestrian bridge across State Route 110 (SR-110) to Stadium Way. It would then travel along Stadium Way and the Dodger Stadium driveway to the Downtown Gate E, before crossing the Dodger Stadium parking areas to reach the Stadium. Along the Dodger Stadium driveway to Downtown Gate E, the existing pedestrian pathway is located in a striped shoulder, and no raised sidewalks are provided.

The walking distance between the Metro L Line (Gold) Station and where riders would exit the Dodger Stadium Station is approximately one mile. The Metro L Line (Gold) Station was selected for this analysis because it is the closest rail station to Dodger Stadium with an estimated walk time of 25 minutes, based on the typical 3.5 feet per second walk time that is used in the California Manual of Uniform Traffic Control Devices (CA MUTCD) for estimating crossing distances. The walk time would likely exceed a 25 minute walk time because it does not take into account pedestrian delay at intersections, crowded walking conditions, slower walk times due to the elevation change, or the walk time up and down the helix ramp to enter and exit the existing pedestrian bridge over the SR-110.

The elevation change of the existing pedestrian path from the Metro L Line (Gold) Station to Dodger Stadium is approximately 215 feet (300 foot elevation above sea level at the Metro L Line (Gold) Station entrance and 515 foot elevation at Dodger Stadium Station).[14] The steepest portion of the existing pedestrian path runs from approximately the intersection of Lookout Drive and Stadium Way (approximately 400 foot elevation) to the location of the Dodger Stadium Station, an elevation change of approximately 115 feet over an approximately 2,200 foot walking distance, or an average of a five percent slope. This slope, on average, is at the upper end of the acceptable slope to comply with Americans with Disabilities Act ("ADA") Accessibility Guidelines, and several sections of the existing pedestrian pathway likely exceed the five percent maximum longitudinal slope requirements under ADA Accessibility Guidelines, which would require the construction of zig zags, and/or the construction of landings, in order to maintain an acceptable slope in compliance with ADA Accessibility Guidelines, which could further increase the walking distance and estimated walk time from the Metro L Line (Gold) Station and Dodger Stadium.

For the portion of the existing pedestrian path between the Metro L Line (Gold) Station and the entrance to Dodger Stadium at the entrance to the Dodger Stadium driveway to Downtown Gate E at Stadium Way, the existing sidewalks on City streets have limited opportunities for widening, as they front existing homes, apartments and businesses. This alternative would include striped

pedestrian crossings with high visibility crosswalks, with MUTCD compliant pedestrian phases, and wayfinding to direct Dodger game and event attendees. Traffic control officers (TCOs) may also be needed to manage pedestrian crossings with large crowds to ensure safety and balance pedestrian and vehicle flow.

Along the Dodger Stadium driveway to Downtown Gate E, this alternative would provide covered vertical circulation/pathways inclusive of sidewalks, and a minimum of three escalators (two to operate in the peak direction) along the Dodger Stadium driveway to Downtown Gate E (approximately 1,600 feet in elevation). As a comparison, this is approximately twice the length of and 30 percent greater elevation gain at the Universal Studios Hollywood Starway, which connects the upper and lower lots of the theme park, over an approximately 170 foot elevation change (600 foot elevation at base of Starway, 770 foot elevation at top of Starway).[15] The Universal Studios Hollywood Starway takes approximately six to seven minutes to traverse the four sets of escalators and landings/walkways in between, so the vertical circulation elements of the Pedestrian Enhancement Alternative could take longer based on it being twice the length of and greater elevation gain than the Starway. Construction of this facility would occur either by removing portions of the embankment along the western edge of the driveway, which would require substantial retaining walls, or removal of vehicle lanes from the Dodger Stadium driveway to Downtown Gate E, which would increase vehicle congestion and queueing.

The Pedestrian Enhancement Alternative was dismissed from further detailed consideration due to the inability to meet most of the proposed Project's objectives. While this alternative would provide improved pedestrian connections compared with existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station under this alternative would be nearly nine times that of the proposed Project travel time of three minutes between these two locations, and would involve substantial physical exertion, even with the proposed vertical circulation enhancements. Given these limitations, this alternative is unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions. The typical distance assumed for walking access to a transit station is a half mile, and much beyond this distance fewer people are willing to walk, and the VMT reduction benefit of transit is diminished. The Pedestrian Enhancement Alternative walking distance would be approximately one mile - twice this distance. Thus, this alternative is unlikely to generate anywhere close to the usage expected by the proposed Project which, given the capacity of the proposed Project, could carry approximately 20 percent of Dodgers fans to Metro's regional transit system.

Due to these limitations, this alternative did not meet the proposed Project's objectives to expand mobility options for transit riders, attract new riders to the Metro system, enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, increase connectivity to the region's public transportation hub at LAUS and the Dodger Stadium property, or to improve the Dodger Stadium visitor experience by providing efficient, high-capacity and faster alternative access to Dodger Stadium, to the same extent as the proposed Project. This alternative would not provide the proposed Project's pedestrian improvements

between Metro's L Line (Gold) Station and the entrance to the Los Angeles State Historic Park, which is provided primarily for passengers transferring between the Metro L Line (Gold) and the proposed Project. In comparison, the Chinatown/State Park Station enhances transit access to surrounding communities, including the Los Angeles State Historic Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway. Chinatown/State Park Station also provides the community benefit of Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Overall, the community benefits listed above would not be constructed under this Pedestrian Enhancement Alternative.

In addition, because this alternative would not reduce VMT to the same extent as the proposed Project, this alternative would not meet the objective to reduce vehicular congestion in and around Dodger Stadium, and on neighborhood streets, arterial roadways, and freeways during game and special event days to the same extent as the proposed Project. And, if vehicle lanes were removed from the Dodger Stadium driveway to accommodate this alternative, this could increase vehicle congestion and queueing.

Accordingly, this alternative was ultimately dismissed from further analysis in the Final EIR because it would not meet most of the project objectives to the same degree as the proposed Project.

While the Pedestrian Enhancement Alternative has been considered but dismissed from further detailed analysis because it does not meet most of the basic project objectives, the proposed Project includes substantial pedestrian enhancements along the proposed Project alignment. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access on the west would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo in an area currently used as a parking and loading area for El Pueblo. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. To facilitate transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating. Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms.

Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. The proposed Project would also provide support for the future Los Angeles State Historic Park bike and pedestrian bridge. Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. The proposed Project would also provide a mobility hub at Dodger Stadium Station where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Footnote 14: Elevations obtained from topographic-map.com. https://en-gb.topographic-map.com/map-s4hdn/Los Angeles/?center=34.13912%2C-118.35473&zoom=16&popup=34.13943%2C-118.35413, accessed August 24, 2023.

Footnote 15: *Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature*, Handy & Boarnet, 2013 https://ww2.arb.ca.gov/sites/default/files/2020-06/Impacts_of_Transit_Access_%28Distance_to_Transit%29_Based_on_a_Review_of_the_Empirical_Literature_Policy_Brief.pdf, accessed August 24, 2023.

Page 4-44, revise the last paragraph as follows:

The Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments as outlined in GHG-PDF-A, and battery back-up as the proposed Project. In addition, the net reduction in criteria pollutant emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As such, the Spring Street Alignment Alternative would not result in an exceedance of the SCAQMD operational maximum daily emissions significance thresholds and would be consistent with the SCAQMD's Air Quality Management Plan. As such, impacts related to air quality under the Spring Street Alignment Alternative would be less than significant. Therefore, impacts related to air quality resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project.

Page 4-45, revise the second and third paragraphs as follows:

Due to the fully urbanized character of the surrounding area, there are no riparian habitats or wetlands within the BSA or adjacent to the State Historic Park Station. In addition, there are currently no active rare, endangered, or threatened habitats listed by the CDFW or the USFWS, or Habitat Conservation Plans or Natural Community Conservation Plans within the BSA or adjacent to the State Historic Park Station. The removal of certain of the trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. However, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the

proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, tree replacement of those removed would more than offset any realized impacts associated with the Project.

Page 4-46, revise the first paragraph as follows:

… biological resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project with mitigation. In addition, the Spring Street Alignment Alternative would also implement BIO-PDF-A through BIO-PDF-F in order to provide additional environmental benefits related to biological resources.

Page 4-47, revise the second full paragraph as follows:

The operational energy usage of the Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in fuel use due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As with the proposed Project, the Spring Street Alignment Alternative's operational energy usage would represent a very small demand on regional energy supplies and would not require the development of additional energy capacity.

Page 4-49, revise the first paragraph as follows:

Similar to the proposed Project, the Spring Street Alignment Alternative would result in a net decrease in GHG emissions compared to existing conditions, albeit a slightly smaller net reduction than the proposed Project. The Spring Street Alignment Alternative would have similar operational energy demands, green power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in greenhouse gas emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same.

Page 4-49, revise the third paragraph as follows:

Hazards and Hazardous Materials

The Spring Street Alignment Alternative would result in development of an ART system; therefore, the Spring Street Alignment Alternative has the potential to increase or change exposure to hazards and hazardous materials. Similar to the proposed Project, during construction activities for the stations, junction, and towers, it is anticipated that limited amounts of hazardous substances, such as solvents, paints, oils, hydraulic fluids, gasoline, diesel fuel, etc. would be transported to and used at the component sites throughout the duration of construction. In order to obtain permits required to commence construction, the Spring Street Alignment Alternative would comply with all applicable local, state and federal regulations. These regulations identify

safety standards and procedures related to the removal, handling, storage, transport, use, and disposal of hazardous materials and require testing, abatement, and remediation when deemed necessary. The Spring Street Alignment Alternative would also implement Mitigation Measure HAZ-A, which requires preparation and submittal to the Los Angeles Department of Building and Safety (LADBS) of a Soil and Groundwater Management Plan. Thus, compliance with all applicable regulations and implementation of Mitigation Measure HAZ-A would ensure that future development would not create a significant hazard to the public, schools, or the environment through the transport, use, disposal, or release of hazardous materials. However, unlike the proposed Project, the Spring Street Alignment Alternative would not require demolition of the existing building at 1201 North Broadway and no mitigation would be required to reduce impacts from hazards or hazardous materials within the 1201 North Broadway building.

Page 4-52, revise the last paragraph as follows:

Implementation of Mitigation Measure TRA-B, WFR-PDF-A, and compliance with applicable State and local regulations, including coordination with LAFD, LAPD, and State Parks prior to construction, would ensure that the Spring Street Alignment Alternative would not create additional demand for LAFD, LAPD, or State Parks services during construction. In addition, with adherence to the applicable regulations, coordination with LAFD, LAPD, and State Parks, and implementation of an Emergency Operations Plan, which would be reviewed prior to the issuance of a building permit, operation of the proposed Project would not create additional demand for LAFD or LAPD services that would result in the need to add new, or physically alter existing fire or police protection facilities.

Page 4-55, revise the second to last paragraph as follows:

Spring Street Junction

Spring Street Junction under the Spring Street Alignment Alternative would be placed in a similar location to Chinatown/State Park Station under the proposed Project. Because the evaluation of the potential to increase geometric hazards is primarily focused on sight visibility for pedestrians and motorists related to the columns, the conclusions for Spring Street Junction under the Alternative are consistent with the conclusions for Chinatown/State Park Station under the proposed Project. This includes the implementation of the visibility enhancements described under Mitigation Measure TRA-A for the Chinatown/State Park Station, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelization of pedestrians to the crosswalk~~,~~ which would alleviate potential visibility issues associated with operation of the Spring Street Junction. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 4-56, revise the first paragraph as follows:

…crossing for pedestrians. Traffic signals are located well beyond the 250 feet required for vertical sight distance, so there is no anticipated vertical sight distance issue related to traffic signals. Vehicles traveling northbound would have a clear line of sight for pedestrians crossing at this intersection, and therefore no sight distance issues are expected. The intersections of Spring Street at Sotello Street and Spring Street at Mesnagers Street are also beyond 250 feet from the columns for both northbound and southbound vehicles, and so there would be a clear line of sight at these intersections and no sight distance issues are expected. To mitigate the potential for significant visibility impacts associated with pedestrians crossing Spring Street at Ann Street, mitigation would be implemented, including the provision of marked crosswalks at the intersection of Spring Street and Ann Street and the signalization of the intersection of Spring Street and Ann Street in order to mitigate the potential visibility impact associated with pedestrians crossing at this intersection. Mitigation ~~Measure TRA-A~~ would therefore be implemented to alleviate potential visibility issues associated with the operation of State Historic Park Station. With implementation of this ~~M~~mitigation ~~Measure TRA-A~~, impacts would be less than significant.

Page 4-56, revise the second full paragraph as follows:

Accordingly, mitigation is required to ~~Implementation of the visibility enhancements described under Mitigation Measure TRA-A would~~ alleviate visibility issues associated with operation of Bishops Tower under the Spring Street Alignment Alternative. As mitigation, the Spring Street Alignment Alternative would implement a three-way stop sign at the intersection of Bishops Road and Savoy Street. With implementation of this ~~—~~ m~~M~~itigation ~~Measure TRA-A~~, impacts would be less than significant.

Page 4-63, add the following after the third paragraph:

The Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.[16] While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that "the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues." Further, unlike the proposed Project, which pursuant to GHG-PDF-A, has pledged to purchase power required for operations from the LADWP Green Power Program, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid's ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express discussed above remain. Given that the Metro fleet would not be electrified until well after the proposed Project's projected opening year, the analysis of the TSM Alternative presumes that the TSM Alternative shuttle buses would not be electric, and would instead operate using natural gas as Metro's buses currently use.

Footnote 16: https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf.

Page 4-65, revise the first and second paragraphs as follows:

However, the increase in emissions under the TSM Alternative would be partially offset by the reduction in VMT due to an increased number of people using public transit to travel to Dodger Stadium instead of private vehicles. Emissions could be further reduced through the use of electric buses for the TSM Alternative. However, the Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.[17] While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that "the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues." Further, unlike the proposed Project, which has pledged to purchase power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid's ability to provide the electricity that Metro would require for a full zero-emission bus fleet.

The proposed Project would also result in a net reduction in criteria pollutant emissions by reducing VMT compared to existing conditions. The TSM Alternative would have higher VMT than the proposed Project, resulting in higher emissions than the proposed Project, even if buses were fully zero-emission, as the TSM Alternative would still result in an increase in bus VMT, with additional buses creating an increase of activity. Because the TSM Alternative involves an increase in emission producing activity over the proposed Project, it would result in increased air quality impacts compared to the proposed Project. The estimated maximum mass daily emissions for the TSM Alternative operations are less than the SCAQMD mass daily significance thresholds for all criteria pollutants. Therefore, impacts related to air quality under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

Footnote 17: https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf.

Page 4-66, revise the first paragraph as follows:

Energy

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. As such, the TSM Alternative would result in a change to current activities on the proposed Project site. In order to accommodate service frequencies of 47 seconds, a minimum of 6 buses loading simultaneously would be required. Because the TSM Alternative would allow for an increased number of people using public transit, associated emissions and fuel use would increase compared to the existing DSE service. However, consumption of energy resources would not be wasteful or inefficient, nor

would the TSM Alternative conflict with energy efficiency plans as the buses used to operate the TSM Alternative would use compressed natural gas. Further, the TSM Alternative buses could be transitioned to electric buses in the future, as Metro considers electrification of its bus fleet by 2035.[18] In addition, compared to the proposed Project, the TSM Alternative's construction phase would be significantly reduced, thus resulting in fewer impacts. Therefore, impacts related to energy under the TSM Alternative would be similar to the less than significant impacts of the proposed Project with mitigation.

However, while operation of the TSM Alternative may result in an increased number of people traveling to Dodger Stadium by public transit, VMT would be higher compared to the proposed Project and associated emissions and fuel use of the additional buses would also result in an increase of energy consumption compared to the proposed Project. Further, even if Metro transitions its bus fleet to electric buses by 2035, after the projected opening year for the proposed Project, the TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and therefore would not achieve the same level of emissions and fuel use reductions as the proposed Project. In addition, the TSM Alternative would not benefit from the proposed Project's green power commitments, as even if Metro transitions to electric buses, Metro has not proposed obtaining electricity from electric buses from green sources, and battery back-up system. As such, while the TSM Alternative could result in reduced VMT compared to existing conditions, the VMT reduction would be less than the proposed Project. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Footnote 18: https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf.

Page 4-66, revise the last three paragraphs as follows:

Geology and Soils

~~The TSM Alternative would not result in development of an ART system and would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.~~

~~Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be higher than but similar to the less than significant impacts of the proposed Project.~~

~~However, compared to the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the aerial tramway, and would not reduce associated GHG emissions and fuel use to~~

~~the same extent as the proposed Project. Therefore, not all of the beneficial GHG reductions associated with the proposed Project would occur.~~

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require modification to the parking lots. Overall, the TSM Alternative would not increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Because the TSM Alternative would not require any new development, excavation activity, or exposure of soils, it would not change the existing exposure to geologic conditions or have an impact on paleontological resources. In addition, the TSM Alternative would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in less than significant impacts related to geology and soils. Therefore, impacts related to geology and soils under the TSM Alternative would be less than the less than significant impacts of the proposed Project with mitigation.

Page 4-67, revise the first three paragraphs as follows:

Greenhouse Gas Emissions

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.

Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

However, compared the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the ~~aerial tramway~~ART system, and would not reduce associated GHG emissions and fuel use to the extent of the proposed Project, although fuel use may be reduced in the future as Metro electrifies its bus fleet by 2035. As such, GHG emissions ~~and fuel use~~ would not be reduced, and fuel use would not be reduced upon initial operations, and could only be reduced in the future if Metro electrifies its bus fleet. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Page 4-73, revise the fourth paragraph as follows:

Utilities and Service Systems

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. Overall, under the TSM Alternative, the existing onsite water and sewer systems would continue to be used, and no new connections to existing utilities systems would be required. No additional demand for regional water supplies would occur, and no additional wastewater would be conveyed to the wastewater treatment facility. In addition, no additional drainage infrastructure would be developed by the TSM Alternative, and runoff in the proposed Project area would remain in its current condition and no storm water system improvements would be required. Further, solid waste generation would remain the same as the existing condition and increases in needs for landfill capacity would not occur with the TSM Alternative. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in no impact to utilities and service systems. Therefore, impacts to utilities and service systems under the TSM Alternative would be reduced compared to the less than significant impacts of the proposed Project.

To the extent that the TSM Alternative transitions to electric buses along with Metro's bus fleet, the April 20, 2023 Metro Board report recognized that there may be potential issues with the electrical grid's ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Accordingly, should the TSM Alternative use electric buses, there may be additional utility impacts associated with the transition. Metro's projected timeline for electrification of the bus fleet would occur after the proposed Project's potential opening year, and therefore this analysis assumes the initial operational conditions.

SECTION 5.0 OTHER CEQA CONSIDERATIONS

In addition to the general additions and corrections provided above, revise Section 5.0, Other CEQA Considerations, as follows:

Page 5-14, revise the first paragraph as follows:

Due to its urbanized and developed nature, the Biological Survey Area (BSA) provides little opportunity for wildlife species or other biological resources to exist. No native plant communities occur within or adjacent to the BSA. There are no wildlife corridors within the BSA to support movement of wildlife species. There are no sensitive natural communities such as wetlands, oak woodlands, or coastal sage scrub habitat within the BSA. There are no Habitat Conservation Plans that overlap with the BSA, and the nearest Significant Ecological Area is located approximately five miles north-northwest of Dodger Stadium at Griffith Park. While construction of the proposed Project would result in the removal of trees, as detailed in Table 3.4 1, their removal and replacement would be subject to the City's Native Tree Protection Ordinance, the City of Los Angeles Urban Forestry Division, and a special permit from the California Department of Parks

and Recreation. Additionally, the proposed Project would implement standard best management practices and mitigation measures related to the control of fugitive dust, noise, and vibration, including compliance with SCAQMD Rule 403, Mitigation Measures NOI-A and NOI-B, and compliance with the Migratory Bird Treaty Act to minimize impacts to roosting bats and nesting birds. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant. In addition, the proposed Project would implement BIO-PDF-A to provide additional environmental benefits regarding biological resources, and following consultation with CDFW, additional Project Design Features were incorporated to provide additional environmental benefits regarding biological resources, BIO-PDF-B, BIO-PDF-C, BIO-PDF-D, BIO-PDF-E, BIO-PDF-F, BIO-PDF-G, and BIO PDF-H.

Page 5-26, revise the second full paragraph as follows:

5.2.8 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions are regionally cumulative in nature. The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. As discussed in Section 3.7, Greenhouse Gas Emissions, current vehicular emissions are associated with games and events at Dodger Stadium as a result of passengers in vehicles traveling to the Stadium, along with employees (i.e., total VMT). By transitioning a portion of the passengers of these vehicles to the proposed Project, total VMT would be reduced along with corresponding reductions in emissions. During operation, the proposed Project would obtain power through renewable electricity pursuant to GHG-PDF-A, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. Additionally, the proposed Project would feature battery storage in lieu of diesel generators as a backup power supply to allow for unloading of the aerial gondola system in the event of a temporary power grid failure. Ultimately, the proposed Project would reduce GHG emissions compared to the baseline conditions. In addition, the proposed Project would be consistent with applicable plans for the reduction of GHG emissions. Therefore, cumulative impacts with respect to GHG emissions would be less than significant.

Page 5-26, revise the last paragraph as follows:

5.2.9 Hazards and Hazardous Materials

Cumulative hazardous materials effects could occur if the related projects within the City of Los Angeles, when combined with the proposed Project, would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may be contaminated from either historic or ongoing uses. The proposed Project and related projects would be required to comply with applicable federal, State, and local regulations that govern hazardous materials during construction. The proposed Project would have the potential to encounter contaminated soils or groundwater during construction. The proposed Project is also located on a site included on a list included on a list of hazardous materials sites. However, Mitigation Measures HAZ-A and HAZ-B described further in Section 3.9, Hazards and Hazardous Materials, include the preparation and submittal to the Los Angeles Department

of Building and Safety (LADBS) of a Soil and Groundwater Management Plan and hazardous materials abatement measures to minimize impacts related to hazards and hazardous materials.

Page 5-28, revise the second paragraph as follows:

The area considered for water quality impacts is the LARWQCB's jurisdiction. The proposed Project and related projects have the potential to generate pollutants during project construction and operation. All construction projects that disturb one acre or more of land would be required to prepare and implement SWPPPs in order to obtain coverage under the Statewide CGP. All projects within the watershed would also be required to prepare and implement LID reports specifying BMPs, that would be applied during project design and project operation to minimize water pollution from project operation. Additionally, as stated in Section 3.9, Hazards and Hazardous Materials, a Soil and Groundwater Management Plan would be prepared, submitted to LADBS, and implemented to specify methods for handling and disposal in the event contaminated groundwater is encountered during construction. The Project Sponsor would prepare and submit an IGP SWPPP, which must be submitted to the SWRCB prior to and adhered to during operations. The IGP SWPPP, which would apply to portions of the proposed Project that include defined industrial activities, such as maintenance and equipment cleaning areas, and the LID Plan would identify the BMPs for Project operations. Therefore, cumulative impacts with respect to water quality would be less than significant.

Page 5-36, revise the first full paragraph as follows:

In the event that proposed Project construction occurs concurrently with related projects in proximity to the Project site, specific coordination among these multiple construction sites would be required and implemented through the proposed Project's Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B in Section 3.17, Transportation, which would be required to ensure adequate emergency access is maintained on adjacent ROW~~S~~s throughout all construction activities.

Page 5-37, revise the fourth full paragraph as follows:

Construction activities associated with the proposed Project would be short term and would take precautions to minimize security incidents that could result in demand for police protection through fencing and other security barriers. Once operational, the proposed Project would include security features, including lighting, staffing, cameras, and access closures at night; cabins with surveillance, secured windows, and two-way communication to system control rooms; and preparation of an Emergency Operations Plan, which would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local and state authorities (e.g., LAFD, LAPD, and State Parks as applicable). The plan would address operational changes and communications protocols required in response to a range of potential emergencies, such as a medical emergency in a cabin or in a station, or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local and state authorities for further instruction and coordination.

Page 5-42, revise the first paragraph as follows:

projects in the vicinity would also be required to analyze and mitigate for transportation-related construction impacts. In addition, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 5-49, revise the last paragraph as follows:

Utilities

The geographic area considered for the analysis of cumulative impacts pertaining to public services is the urbanized and developed City of Los Angeles. Implementation of the proposed Project in conjunction with the related projects would increase the demand for electricity. For the City of Los Angeles, LADWP is the sole supplier of electricity to businesses and residents of the area. It is estimated that the ART system would require a total estimated power requirement of approximately 2.5 megawatts to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. It was determined in Section 3.6, Energy, and Section 3.19, Utilities and Service Systems, that implementation of the proposed Project would ~~would~~ not have a substantial effect on State-wide or regional energy resources.

Page 5-53, revise the last paragraph as follows:

The electrical power for Project operations of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources.

Page 5-55, revise the first paragraph as follows:

The proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to LADBS a ~~s~~Soil and ~~g~~Groundwater ~~m~~Management ~~p~~Plan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction to less than significant.

Page 5-55, revise the fourth paragraph as follows:

Implementation of the proposed Project would commit land designated as public ROW, commercial, residential, and open space uses at the stations, junction, and towers to transit uses. The majority of the Project alignment and components would be constructed within or above the public ROW and/or publicly owned property. However, no housing or businesses would be

displaced. As discussed in Chapter 2, Project Description, Subsection 2.11, Required Permits and Approvals, the Project Sponsor is seeking ~~to amend LAMC Sections 12.32 and 11.5.7~~ to create a~~n Overlay District or~~ Specific Plan pursuant to LAMC section 11.5.7 to provide for consistent application of Project design standards, limitations, and operational measures. With approval of the permits and approvals listed in Subsection 2.11, ~~the amendments to the zoning code to allow the proposed Project uses,~~ development of these Project components would not conflict with the applicable LAMC requirements at the time of Project implementation, and the impact would be less than significant.

Page 5-62, revise the second paragraph as follows:

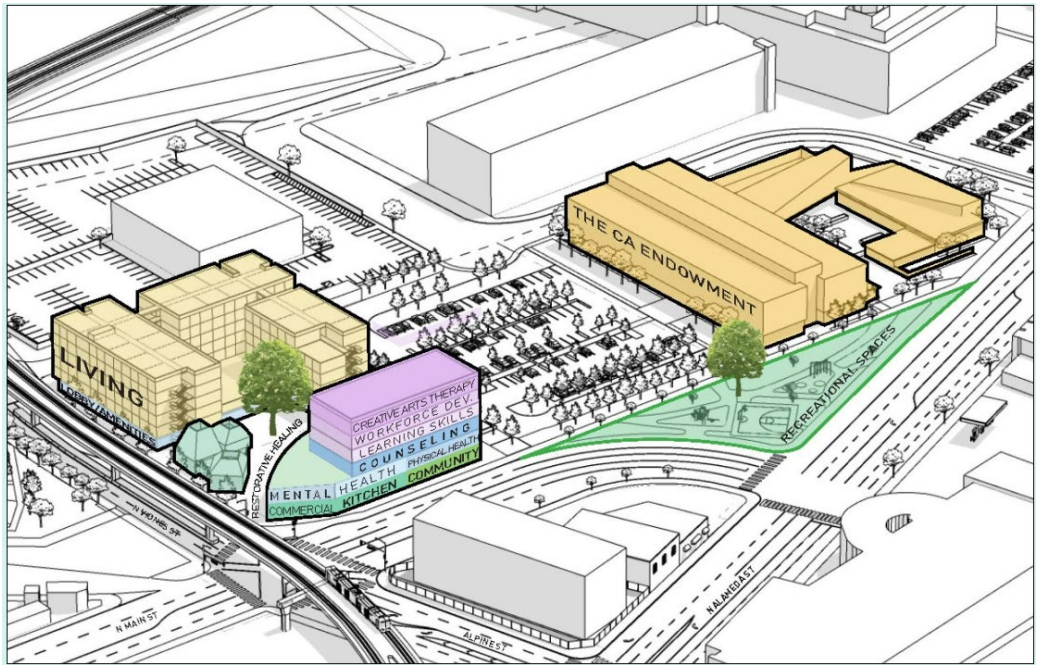
ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Aside from the tallest types of event uses (e.g., stages with tall screens), which could be sited directly adjacent to the alignment, all other event uses, such as food trucks, production areas, and seating areas, can occur directly beneath the alignment. In addition, ~~as~~ as depicted on Figure 5-3, according to the Los Angeles State Historic Park Bike and Pedestrian Bridge Feasibility Study, the Project alignment is located outside of typical locations for event stages. Moreover, Figure 5-4 depicts potential temporary special event stage, structures, and use locations that the Los Angeles State Historic Park has made available for special events within the park. However, the proposed Project could affect the ability to use those areas for specific special event structures. Coordination as to operation of special events at the Los Angeles State Historic Park and the proposed Project are anticipated to ~~be~~ be addressed in operational agreements related to the park.

Page 5-68, add a new Section 5.5.6:

Hope Village

The California Endowment published its Annual Report 2023[38] with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as "RECREATIONAL SPACES."

The following graphic from the Annual Report 2023 depicts the recreational spaces.



As detailed in Section 2.0, Project Description, the proposed Project proposes to locate the Alameda Tower in the northwest corner of the Alameda Triangle. The Alameda Tower base would be 900 square feet, as depicted in Figure 2-12: Proposed Alameda Tower Location. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

The proposed Project would not impair or impact The California Endowment's potential use of the Alameda Triangle for recreational spaces. As noted, the Tower base would be located in 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic depicts the Alameda Triangle, including space for both the Alameda Tower and potential recreational spaces based on the graphic in the Annual Report 2023.

The proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces.

Footnote 38: The California Endowment, Annual Report 2023, available at https://www.calendow.org/annual-report (accessed August 25, 2023).

SECTION 6.0 DESIGN AND USE OPTIONS

In addition to the general additions and corrections provided above, revise Section 6.0, Design and Use Options, as follows:

Page 6-1, revise the fourth paragraph as follows:

The five design and use options are described below, along with an analysis of their potential environmental impacts. The impact analysis is performed relative to the respective Project component of the proposed Project. For reference, the proposed Project is described in detail in Section 2.5 of the Project Description. Specifically, stations and junctions are described in Section 2.5.3, while towers are described in Section 2.5.4. All design and use options could be implemented individually, together, or in any combination without changing the significance conclusions reached in the EIR for the proposed Project.

Page 6-1, revise the fifth paragraph as follows:

6.2 Design Option A

6.2.1 Description

Design Option A includes a shift in the overall Project alignment between the Broadway Junction and Dodger Stadium Station to avoid aerial rights requirements over 451 E. Savoy Street. Figure 6-1 shows the proposed Project alignment, with additional detail as to the public ROW, publicly owned property, and private properties in Appendix P, Design Option A Plan and Profile. As shown in Figure 6-2 below, under Design Option A, while headed north from the Broadway Junction, the alignment would shift to be further west from 451 E. Savoy Street. This shift would result in the alignment crossing over a small portion of Cathedral High School. This Design Option includes changes to the Project components of Broadway Junction, Stadium Tower, and Dodger Stadium Station. These changes are described below.

Page 6-2, revise the first paragraph as follows:

In addition, the shift at Stadium Tower would result in utility relocations, including the relocation of a water valve and encroachment into the City's water easement in this location, as well as the potential addition of a retaining wall on the upslope. The shift at Dodger Stadium Station would also result in, the realignment of the Dodger Stadium perimeter roadway. In addition, construction of the Dodger Stadium Station at this location would require utility relocations, including relocation of a 36-inch storm drain and telecom line and encroachment into the City's water easement at this location. Moreover, construction of the Dodger Stadium Station at this location requires construction on steeper slopes and the potential addition of a retaining wall to accommodate the steeper approach to the station. The Dodger Stadium Station at this location would also require removal of ~~additional~~ 337 parking spaces at the Dodger Stadium property (compared to 194 for the proposed Project) and requires a longer walk for proposed Project passengers to travel between the Dodger Stadium Station Dodger Stadium.

Page 6-8, revise the first full paragraph as follows:

Design Option A does not materially differ in overall dimension, location, building material, or construction technique as compared to the proposed Project. Design Option A would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; ~~Land Use and Planning;~~ Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; and Wildfire. Any mitigation measures required for the respective proposed Project components would also be required for those of Design Option A.

Page 6-11, revise the last full paragraph as follows:

Air Quality

Under Design Option A, the Broadway Junction would result in similar impacts related to air quality as the proposed Project. Therefore, no additional analysis is required for this Project component. Stadium Tower and Dodger Stadium Station are the only components of Design

Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of air quality impacts from Stadium Tower and Dodger Stadium Station is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the first paragraph as follows:

Biological Resources

Under Design Option A, the Broadway Junction and Dodger Stadium Station would result in similar impacts related to biological resources as the proposed Project, and would similarly implement the project design features BIO-PDF-A through BIO-PDF-H in order to provide additional environmental benefits related to biological resources. Therefore, no additional analysis is required for these Project components. Stadium Tower is the only component of Design Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of biological resources impacts from Stadium Tower is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the second paragraph as follows:

A tree inventory report was prepared (attached to Appendix C of this Draft EIR), and trees occurring along the Project alignment were inventoried for species, size, and location. The City of Los Angeles Planning Department considers all trees with trunk diameters of eight inches or greater as 'significant.' Based upon the tree inventory report, ~~31~~55 significant trees at the Stadium Tower location, including the fire buffer zone (as described in Section 3.20, Wildfire), for construction would be removed under the proposed Project. Using this same tree inventory report, ~~up to approximately 85significant trees would be removed at~~ a similar number of significant trees would be removed at Stadium Tower location under Design Option A, including the fire buffer zone. ~~This would result in up to 54 additional significant trees being removed for construction and operation of the Stadium Tower under Design Option A.~~ None of these inventoried trees were identified as City-ordinance protected trees.

Page 6-17, add in the following paragraph before the "Utilities and Service Systems" heading as follows:

Land Use and Planning

Under Design Option A, the Broadway Junction and Stadium Tower would result in similar impacts related to land use as the proposed Project. Therefore, no additional analysis is required for these Project components. An additional analysis of land use impacts from Dodger Stadium Station is provided below.

Dodger Stadium Station

Dodger Stadium Station under Design Option A would result in the removal of additional parking spaces as compared to the proposed Project. As discussed in Section 3.11, Land Use and Planning, the Dodger Stadium CUP requires "[t]hat automobile parking facilities for a minimum of one (1)

automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on the site generally . . .". Condition no. 1 of the Dodger Stadium CUP states that Dodger Stadium "shall have a maximum seating capacity of 56,000 persons." Condition no. 3 of the Dodger Stadium CUP requires "[t]hat automobile parking facilities for a minimum of one (1) automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on site", so a total of 15,556 parking spaces must be provided and maintained on site. There are currently a total of 18,889 parking spaces provided and maintained on site. Design Option A would permanently remove 337 parking spaces for the Dodger Stadium Station, due to the increased distance to Dodger Stadium requiring additional area for the proposed pedestrian connection to Dodger Stadium, as well as the retaining wall. Similar to the proposed Project, however, and consistent with the Dodger Stadium CUP, a total of 18,552 parking spaces would remain on site, exceeding the required parking spaces under the CUP. While additional parking spaces would be temporarily utilized at Dodger Stadium for Project construction, the number of parking spaces would at all times exceed the 15,556 total parking spaces that must be provided and maintained on site pursuant to the CUP. Accordingly, Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation.

Page 6-18, revise the second to last paragraph as follows:

In the process of selecting tower locations, the proposed Project prioritizes the use of public property and minimizes private land acquisition, and also considers the proposed Project's relationship to existing adjacent and potential future land uses. Technical considerations of tower locations also include optimizing the height of the towers and minimizing the number of towers. Additionally, the proposed Project limits the bend on the towers to less than ~~1.5~~ 2 degrees.

Page 6-20, revise the second and third paragraphs as follows:

Compared to the proposed Project, Design Option B would potentially result in ~~potential~~ additional technical considerations ~~constraints due to the taller because the tower that approaches the limits of technical feasibility~~ due to the increased angle of bend at the Alameda Tower compared to the proposed Project.

Additionally, Design Option B results in the need for additional private aerial rights requirements. Design Option B includes an increased bend on the Alameda Tower resulting in cables and gondola cabins in closer proximity to private property between Alameda Station to the Chinatown/State Park Station. The proposed Project aerial rights requirements are shown on Figure 6-12 and the proposed Design Option B shift and associated aerial rights requirements are shown on Figure 6-13, with additional detail as to the public ROW, publicly owned property, and private properties provided in Appendix Q, Design Option B Plan and Profile.

Page 6-28, add the following sentence and revise the last sentence of the page as follows:

Similar to the proposed Project, Design Option B would implement Mitigation Measure TRA-A, which would prohibit right turns on red from westbound Alhambra Avenue to northbound

Alameda Street in order to alleviate potential visibility issues associated with operation of the Alameda Tower.

In addition, similar to the proposed Project, operation of Design Option B would provide additional transit and pedestrian connections, and would result in an overall reduction in VMT, resulting in a beneficial effect on the environment. Therefore, similar to the proposed Project, and with the implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C, impacts with respect to transportation under Design Option B would be less than significant with mitigation.

Page 6-29, revise the first sentence of the second paragraph as follows:

In response to stakeholder feedback, who asked the Project Sponsor to consider a taller Chinatown/State Park Station to increase the height of cabins entering and ~~existing~~ exiting the station along Spring Street, Design Option C consists of a 35-foot overall height increase at the Chinatown/State Park Station.

Page 6-49, revise the fourth paragraph as follows:

Under Design and Use Option E, Mitigation Measure HAZ-A, which requires preparation and submittal to LADBS of a ~~s~~Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities, would still be required. Implementation of HAZ-A will specify methods for handling and disposal in the event contaminated groundwater is encountered during construction of Design and Use Option E, to reduce impacts to less than significant. Therefore, similar to the proposed Project, impacts with respect to hazards and hazardous materials for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

SECTION 7.0 ACRONYMS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 8.0 LIST OF PREPARERS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 9.0 REFERENCES

The added references below were included on the proposed Project's SB 44 website at the time the Draft EIR was published for public review, but were inadvertently omitted from Section 9.0, References, of the Draft EIR.

Page 9-1, revise before 3.1 Aesthetics Section as follows:

Executive Summary

32 CFR Section 767.8.

California Code of Regulations, Article 4, Sections 1529, 5208, and 1532.

California Code of Regulations, Section 2485.

California Geological Survey Special Publication 117 (as amended).

California Public Resources Code (PRC) Section 21083.2(i).

California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

OSHA 29 CFR Sections 1926.62 and 1926.1101.

Public Resources Code 5002.2.

SCAQMD Rule 1403.

Secretary of Interior Standards for Archaeology (36 CFR § 61).

Secretary of Interior's Standards for the Treatment of Historic Properties (60 FR 35843).

Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (68 FR 43159.

1.0 Introduction

49 U.S.C. § 5302(7).

69 FR 78209-78210.

2019 California Green Building Standards Code, available at: https://calgreenenergyservices.com/wp/wpcontent/uploads/2019_california_green_code.pdf.

Cal. Pub. Res. Code § 21168.6.9(a)(1)(A)-(F).

Connect SoCal The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Adopted September 3, 2020, Page 10. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed March 2022.

Connect SoCal The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Available at: https://scag.ca.gov/read-plan-adopted-final-plan. Accessed September 2022.

FTA, National Transit Database 2021 Policy Manual, at p. 28.

Senate Bill (SB) 44, effective January 1, 2022.

The Institute for Sustainable Infrastructure's Envision Rating System, available at: https://sustainableinfrastructure.org/envision/use-envision/.

2.0 Project Description

2019 California Green Building Standards Code, available at: https://calgreenenergyservices.com/wp/wpcontent/uploads/2019_california_green_code.pdf.

American Nat'l Standards Inst., ANSI B77.1-2017 Passenger Ropeways – Aerial Tramways, Aerial Lifts, Surface Lifts, Tows and Conveyors – Safety Standard. On May 5, 2022, ANSI B77.1-2022 was approved and is in publication. The aerial clearance requirements of ANSI B77.1 are unchanged in the revision from 2017 to 2022.

ANSI/ASHRAE 62.1, recognized standard for ventilation and indoor air quality.

California Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 Map, https://oehha.ca.gov/calenviroscreen/maps-data, accessed August 16, 2022.

California State Transportation Agency, Transit and Intercity Rail Capital Program, Fourth Round Selected Project– Project Detail Summary, April 2020, available at: https://calsta.ca.gov/-/media/calsta-media/documents/2020-tircp-detailed-project-award-summary.pdf, accessed March 4, 2022.

California Streets and Highways Code, Section 660.

City of Inglewood, Inglewood Transit Connector Project Final Environmental Impact Report, available at: https://www.cityofinglewood.org/DocumentCenter/View/17236/ITC_FEIR_Feb2022.

City of Los Angeles Department of City Planning, Central City Community Plan, January 2003, available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city, accessed March 4, 2022.

City of Los Angeles Department of City Planning, Central City North Community Plan, available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north, accessed March 4, 2022.

City of Los Angeles Department of City Planning, Silver Lake-Echo Park-Elysian Valley Community Plan, August 2004, available at: https://planning.lacity.org/plans-policies/community-plan-area/silver-lake-echo-parkelysian-valley, accessed August 16, 2022.

City of Los Angeles Department of Recreation and Parks, Elysian Park Master Plan, June 2006, available at: https://www.elysianpark.org/s/EP1_Introduction.pdf, accessed August 16, 2022.

City of Los Angeles, El Pueblo de Los Angeles Historical Monument, About Us, available at: https://elpueblo.lacity.org/about-us, accessed March 4, 2022.

City of Los Angeles, El Pueblo de Los Angeles Historical Monument, History, available at: https://elpueblo.lacity.org/history-el-pueblo, accessed March 4, 2022.

Civil Code Section 801.

Communication with Cesar Dockweiler who is responsible for design, implementation and operation of Mi Teleférico in La Paz, April 10, 2020.

Dale, Steven, et al. Cable Car Confidential: The Essential Guide to Cable Cars, Urban Gondolas & Cable Propelled Transit. Creative Urban Projects, 2013.

Doppelmayr Garaventa Group, 10-MGD Emirates Air Line, 2020, available at: https://www.doppelmayr.com/products/references/10-mgd-emirates-air-line/.

Doppelmayr Garaventa Group, 35-TGD BUGA Koblenz, n.d., available at: https://www.doppelmayr.com/de/systeme/referenzen/35-tgd-buga-koblenz/.

Doppelmayr Garaventa Group, 3S Installation BUGA Koblenz 2011, 2010, November 1, available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/3s-installation-buga-koblenz-2011/.

Doppelmayr Garaventa Group, Doppelmayr completes the world's biggest urban ropeway network, 2019, March 12, available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/doppelmayr-completes-the-world-news/.

Doppelmayr Garaventa Group, Doppelmayr opens the world's longest ropeway, 2018, February 5, available at: https://newsroom.doppelmayr.com/en/doppelmayr/press/doppelmayr-opens-the-world/.

Doppelmayr Garaventa Group, First trip on the Línea Celeste Section 1 and Línea Blanca, 2018, January 31, available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/first-trip-on-the-l%C3%ADnea-celeste-section-1-and-l%C3%ADnea-blanca/.

ESPN.com, MLB Attendance Report – 2019, available at: http://www.espn.com/mlb/attendance/_/year/2019, accessed March 4, 2022.

Government Code Section 14666.

Government Code Sections 65864 through 65869.5.

https://en.wikipedia.org/wiki/Emirates_Air_Line_(cable_car).

https://mexicobusiness.news/infrastructure/news/cablebus-lines-1-and-2-begin-operating-july.

LAMC Section 11.5.7.

LAMC Section 12.24.M.

LAMC Sections 13.11 and 12.32.S.

Los Angeles Charter and Administrative Code, Sec. 13.4. Applicability.

Los Angeles Charter and Administrative Code, Sec. 22.109. Board of Cultural Affairs Commissioners Control over Works of Art.

Los Angeles Charter and Administrative Code, Sec. 390. Franchises.

Los Angeles County Metropolitan Transportation Authority, Crenshaw/LAX Transit Project, available at: https://www.metro.net/projects/crenshaw_corridor/, accessed March 4 , 2022.

Los Angeles County Metropolitan Transportation Authority, Los Angeles Union Station Forecourt and Esplanade Improvements Project Final Environmental Impact Report, March 2018, available at: https://www.dropbox.com/sh/55np14p60s3tch0/AABwyW69bkwUScao1ov2-kD2a/Environment%20Documents?dl=0&subfolder_nav_tracking=1, accessed March 4 , 2022.

Los Angeles County Metropolitan Transportation Authority, Los Angeles Union Station Master Plan, available at: https://www.metro.net/projects/la-union-station/.

Los Angeles County Metropolitan Transportation Authority, Los Angeles Union Station Master Plan, Los Angeles Union Station Design Report, available at: https://www.metro.net/projects/la-union-station/, accessed March 4, 2022.

Major League Baseball, Dodger Stadium History, available at: https://www.mlb.com/dodgers/ballpark/information/history, accessed March 4, 2022.

Mi Teleférico. Trans-Americas Journey, March 18, 2021, available at: https://trans-americas.com/mi-teleferico-cable-cars-la-paz-bolivia/.

NBA.com, Intuit Dome, available at: https://www.nba.com/clippers/intuitdome, accessed June 28, 2022.

OHSU News, Portland Aerial Tram Turns 10, 2017, January 27, available at: https://news.ohsu.edu/2017/01/28/portland-aerial-tram-turns-10.

Personal communication with Mr. Frederic Demoulin, Urban Ropeways Project Manager, Leitner-Poma of America, Inc., on August 12, 2022.

POMA, 3S Aerial Tramway – TELEO, n.d., available at: https://www.poma.net/en/work/teleo/.

Portland Aerial Tram, Learn More, n.d., available at: http://www.gobytram.com/about.

Public Resources Code Section 5002.2.

Public Resources Code Section 5003.

Public Utilities Code Sections 130521-130252.

Roosevelt Island Operating Corporation, Aerial Tramway Vital Statistics, n.d., available at: https://rioc.ny.gov/173/Aerial-Tramway-Vital-Statistics.

Roosevelt Island Operating Corporation, History, n.d., available at: https://rioc.ny.gov/169/History.

Senate Hearing Before the Committee on Appropriations, Department of Transportation and Related Agencies Appropriations for Fiscal Year 1978, 95th Congress, H.R. 7557, United

States Government Printing Office Washington, 1978, Google Books, available at: https://books.google.com/books?id=MUyomyzyB_EC&pg=PA1612&lpg=PA1612&dq=roosevelt+island+aerial+tram+capacity+of+people+per+hour+per+direction&source=bl&ots=fGboxL5fjB&sig=ACfU3U07UDFZCVm1uzj9jUeQwkzCtGD61w&hl=en&sa=X#v=onepage&q=roosevelt%20island%20aerial%20tram%20capacity%20of%20people%20per%20hour%20per%20direction&f=true.

Sistema de Transporte Masivo y Teleférico, Mexicable Línea 2: "Indios Verdes - Hank González" (En Construcción), Retrieved on 2022, August 11, available at: https://masivoedomex.blogspot.com/2020/07/mexicable-linea-2.html.

Southern California Association of Governments, 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, or "Connect SoCal" available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 11, 2022.

Speeding up the Mobility Transition: Victor Jasso Interview (Mexicable) as of August 2019, available at: https://www.intertraffic.com/news/infrastructure/speeding-up-in-mobility-victor-jasso-mexicable/.

Staten Island NY Local News, Staten Island Tram would require new technology to make trips to Manhattan, 2015, June 4, available at: https://www.silive.com/news/2015/06/staten_island_tram_would_requi.html.

The Gondola Project, February 9, 2019, available at: http://gondolaproject.com/category/installat/Data%20shown%20only%20includes%20Mexicable%20and%20does%20not%20include%20Cablebus%20lines%205.ions/cablebus/.

The Institute for Sustainable Infrastructure's Envision Rating System, available at: https://sustainableinfrastructure.org/envision/use-envision/.

Title 8, California Code of Regulations, Sections 3150 through 3191.

Title 14, California Code of Regulations, residential ventilation requirements standards.

United States Green Building Council Leadership in Energy and Environmental Design for New Construction v4.1, available at: https://www.usgbc.org/leed/v41

Page 9-39, revise after "United States Geological Survey. 2018 Post-Fire Flooding and Debris Flow. Available at: https://www.usgs.gov/centers/ca-water/science/post-fire-flooding-and-debris-flow?qt-science_center_objects=0#qt-science_center_objects. Accessed May 2022," as follows:

4.0 Alternatives

California Assembly Bill 32: The Global Warming Solutions Act of 2006 (AB 32).

California Assembly Bill 52 (Chapter 532, Statutes 2014): Tribal Cultural Resources (AB 52).

California Assembly Bill 341 (Chapter 476, Statutes 2011): Mandatory Commercial Recycling Law (AB 341).

California Assembly Bill 939 (Chapter 1095, Statutes 1989): California Integrated Waste Management Act (AB 939).

California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Data Base (CNDDB). Full report for Los Angeles, Burbank, Pasadena, Mt. Wilson, Hollywood, El Monte, Inglewood, South Gate, and Whittier quadrangles.

California Education Code, Title 1, Division 1, Part 10.5, Chapter 6: Development Fees, Charges, and Dedications, Sections 17620-17626.

California Fish and Game Code (CFGC).

California Health and Safety Code Section 7050.5.

California SB 375 (Chapter 728, Statutes of 2008).

California State Department of Parks and Recreation. Los Angeles State Historic Park Interpretive Master Plan. 2006. Available at: https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-Interpretive-Master-Plan-1.pdf.

Caltrans. 2022. Scenic Highways – Scenic Highway System Lists. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

City of Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. September 2016.

City of Los Angeles Department of City Planning, Alameda District Specific Plan. 1996. Available at: https://planning.lacity.org/odocument/11788e44-7659-4e6f-95d6-4b5d5861b1ba/Alameda_District_Specific_Plan.pdf. June 1996.

City of Los Angeles Department of City Planning, Central City Community Plan, Objective 4.2.

City of Los Angeles Department of City Planning, Central City North Community Plan, Objective 5.1, available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north.

City of Los Angeles Department of City Planning, Cornfield Arroyo Seco Specific Plan, adopted 2013, available at: https://planning.lacity.org/odocument/9d013e0f-452b-4857-86d5-fcd357b27a4d, accessed June 2022.

City of Los Angeles General Plan Framework Element, Chapter 5, Urban Form and Neighborhood Design.

City of Los Angeles General Plan Framework Element, Chapter 6, Open Space and Conservation.

City of Los Angeles Municipal Code.

City of Los Angeles Transportation Analysis Guidelines.

Final Report: MSRC Contract MS21001 Dodger Stadium Express 2019 Season, Los Angeles County Metropolitan Transportation Authority, April 3, 2020.

Government Code Section 65962.5.

Los Angeles County Metropolitan Transportation Authority (Metro). 2019. Metro Climate and Adaptation Plan 2019. Available at: https://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf, accessed June 2022.

Los Angeles County Metropolitan Transportation Authority (Metro), 2020 Transit Service Policies & Standards, page 12. Available at: https://www.dropbox.com/s/qmnfvhzv7mw8lat/nextgen-report-tsp-final.pdf?dl=0. Accessed June 2, 2022.

Los Angeles State Historic Park General Plan.

Personal communication with Mr. George Del Valle, Principal Transportation Planner, Metro Contract Services, on May 31, 2022.

Public Resources Code Section 5097.98.

Public Resources Code Section 21074.

RIO District Ordinance.

Senate Bill No. 32, Chapter 249. California Global Warming Solutions Act of 2006: emissions limit (SB 32).

South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan (AQMP). March 2017. Available at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

Southern California Association of Governments (SCAG). 2020. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Adopted September 3, 2020. Available at: https://scag.ca.gov/read-plan-adopted-final-plan, accessed June 2022.

U.S. Fish and Wildlife Service (USFWS). 2020. Migratory Bird Treaty Act Protected Species (10.13 List). Available at: https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php.

5.0 Other CEQA Considerations

2019 California Green Building Standards Code, available at: https://calgreenenergyservices.com/wp/wpcontent/uploads/2019_california_green_code.pdf.

AirNav.com.

ANSI B77.1.

Burbank to Los Angeles, Draft EIR/EIS, 3.17-71.

California Assembly Bill 52 (Chapter 532, Statutes 2014): Tribal Cultural Resources (AB 52).

California Assembly Bill 341 (AB 341).

California Assembly Bill 939 (AB 939).

California Assembly Bill 1939 (2000), (AB 1939).

California Assembly Bill 2770 (2002), (AB 2770).

California Building Code, Title 24.

California Constitution Article XIII, Section 35(a)(2).

California Department of Housing and Community Development. CALGreen. Available at https://www.hcd.ca.gov/calgreen.

California Department of Park and Recreation. 2012. Los Angeles State Historic Park Master Plan Development Plan Phase I Implementation.

California Department of Parks and Recreation. (DPR). 2006. Los Angeles State Historic Park Interpretive Master Plan.

California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

CalRecycle, Estimated Solid Waste Generation Rates, available at: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates.

Caltrans. 2022. Helicopter Permits. Website https://dot.ca.gov/programs/aeronautics/heliport-permits. Accessed May 2022.

Caltrans. 2022. Scenic Highways – Scenic Highway System Lists. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed April 2022.

CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April. Available at: https://ww3.arb.ca.gov/ch/handbook.pdf. Accessed May 2022.

Circlepoint, Final Environmental Impact Report: Alameda District Specific Plan Addendum No. 1 (City of Los Angeles Department of City Planning, July 2018), 41-42.

City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833.

City of Los Angeles. 2001. City of Los Angeles General Plan Conservation Element. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

City of Los Angeles Best Management Practices Handbook.

City of Los Angeles, CEQA Thresholds Guide, 2006.

City of Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. September 2016.

City of Los Angeles Department of City Planning, August 2020, available at: https://planning.lacity.org/development-services/eir/downtown-community-plan-updatenew-zoning-codedowntown-community-plan. Accessed May 2022.

City of Los Angeles Department of Recreation and Parks. 2022. Available at: https://www.laparks.org/planning/park-fees. Accessed May 2022.

City of Los Angeles General Plan.

City of Los Angeles Green Building Code, Article 9 of Chapter IX of the Los Angeles Municipal Code.

City of Los Angeles. L.A.'s Green New Deal: Sustainable City pLAn. Available at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

City of Los Angeles Low Impact Development (LID) Requirements. All development must comply with County of Los Angeles, Title 12, Chapter 12.84 (LID).

City of Los Angeles Municipal Code regulations related to geology and soils.

City of Los Angeles Municipal Code. Section 12.05.

City of Los Angeles, Ordinance No. 184505, Parks Dedication and Fee Update ordinance, 2016.

City of Los Angeles, Ordinance No. 186873, Native Tree Protection ordinance, 2021.

City of Los Angeles, Solid Waste Integrated Resource Plan.

County of Los Angeles Construction and Demolition Recycling and Reuse Ordinance.

County of Los Angeles Department of Public Works (LADPW). 1997. Countywide Integrated Waste Management Plan (CoIWMP).

Draft Environmental Impact Report/Environmental Impact Statement: Burbank to Los Angeles Project Section, (California High-Speed Rail Authority, May 2020), 3.17-71.

ESA, Draft Environmental Impact Report: College Station Project (City of Los Angeles Planning Department, March 2018), ES-11.

ESA PCR, 1201 N. Broadway Proposed Mitigated Negative Declaration (City of Los Angeles Planning Department, May 2017), B-36.

Fehr & Peers. Transportation Technical Report for Los Angeles Aerial Rapid Transit Project. September 2022.

Final Environmental Impact Report: Link Union Station (Los Angeles County Metropolitan Transit Authority [Metro], June 2019), 3.12-53.

Forecourt and Esplanade Improvement Project, addendum to Final EIR, dated September 2020, 3.6-27.

Forecourt and Esplanade Improvement Project, Draft EIR, dated August 2017, 3.1-22.

Government Code Section 65995.

LASAN. Sewage Generation Factors, available at: https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf.

LAUSD. 2020 Developer Fee Justification Study, Los Angeles School District, available at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, accessed May 2022.

Link Union Station, Final EIR, dated June 2019, 3.12-73.

Los Angeles Department of City Planning. 2015. Zoning Information No. 2358. River Improvement Overlay District: Ordinance Nos. 183144 and 183145. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2358.pdf.

Los Angeles Fire Code (LAFC) Section 3312.

Los Angeles Sanitation & Environment (LASAN). 2021. About One Water LA 2040 Plan. Available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au?_adf.ctrl-state=zf22b5gop_5&_afrLoop=15166652381721998#!.

Los Angeles State Historic Park General Plan.

Los Angeles State Historic Park General Plan Amendment.

Los Angeles Union Station Forecourt and Esplanade Improvement Project: Addendum No. 2 to the Environmental Impact Report (Los Angeles County Metropolitan Transit Authority [Metro], September 9, 2020), 3.6-27.

Los Angeles Union Station Forecourt and Esplanade Improvement Project: Draft Environmental Impact Report (Los Angeles County Metropolitan Transit Authority [Metro], August 2017), 3.6-31.

Los Angeles Union Station Forecourt and Esplanade Improvements Project, Environmental Impact Report, State Clearinghouse Number 3016121064, certified by the LA Metro Board of Directors in March 2018.

NPS. 2022. California: Arroyo Seco Parkway, Available at: https://www.nps.gov/places/arroyo-seco-parkway.htm. Accessed April 2022.

Public Resources Code 5002.2.

Public Resources Code 5019.59.

Public Resources Code 21174.

Senate Bill (SB) 50, impacts of new development on school facilities.

SCAG. 2016. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Available at: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557.

SCAG. Connect SoCal. Available at: https://scag.ca.gov/connect-socal.

SCAQMD. 2003. Cumulative Impacts White Paper-Appendix D. August. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-workinggroup/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed May 2022.

South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan (AQMP). March 2017. Available at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

SCAQMD Rule 403.

U.S. Department of Energy, Stockpile Stewardship and Management Plan (SSMP).

U.S. Fish and Wildlife Service (USFWS). 2020. Migratory Bird Treaty Act Protected Species (10.13 List). Available at: https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php.

6.0 Design and Use Options

3.2.540 CFR 131.38 – California Toxics Rule.

Antidegradation Policy of 1968.

California Assembly Bill 52 (Chapter 532, Statutes 2014): Tribal Cultural Resources (AB 52).

California Assembly Bill 341 (AB 341).

California Assembly Bill 939 (AB 939).

California Budget Act of 2018.

California Department of Parks and Recreation. 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: https://www.parks.ca.gov/pages/21299/files/LASHP%20General%20Plan-EIR.pdf, accessed June 2022.

California Department of Parks and Recreation. (DPR). 2006. Los Angeles State Historic Park Interpretive Master Plan.

California Health and Safety Code Section 7050.5.

California Ocean Plan.

California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

City of Los Angeles Bureau of Sanitation. 2016. Planning and Land Development Handbook for Low Impact Development (LID), 5th edition.

City of Los Angeles Citywide Design Guidelines, October 24, 2019.

City of Los Angeles Department of City Planning. 2013. Cornfield Arroyo Seco Specific Plan. Available at: https://planning.lacity.org/odocument/9d013e0f-452b-4857-86d5-fcd357b27a4d.

City of Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. September 2016.

City of Los Angeles Department of City Planning, Alameda District Specific Plan. 1996. Available at: https://planning.lacity.org/odocument/11788e44-7659-4e6f-95d6-4b5d5861b1ba/Alameda_District_Specific_Plan.pdf. June 1996.

City of Los Angeles Emergency Management Department. 2018. Emergency Operations Plan. Available at: https://emergency.lacity.org/sites/g/files/wph1791/files/2021-04/comprehensive_emergency_operations_plan_eop-_2018.pdf.

City of Los Angeles General Plan.

City of Los Angeles LAMC 62.104.1, Sidewalk Repair Program Street Tree Policy, April 2021.

City of Los Angeles Low Impact Development (LID) Requirements. All development must comply with County of Los Angeles, Title 12, Chapter 12.84 (LID).

City of Los Angeles Municipal Code.

City of Los Angeles Ordinance No. 186873, Native Tree Protection. 2021.

City of Los Angeles Solid Waste Integrated Resource Plan.

City of Los Angeles Water Quality Compliance Master Plan.

Clean Water Act of 1972 (including 1977 and 1987 Amendments).

Los Angeles Fire Code (LAFC).

Los Angeles Fire Code (LAFC), Section 503.

Los Angeles Regional Water Quality Control Board Basin Plan.

Los Angeles State Historic Park General Plan Amendment.

Metro. 2020. Moving Beyond Sustainability: Sustainability Strategic Plan 2020. Available at: http://media.metro.net/2020/Moving-Beyond-Sustainability-Strategic-Plan-2020.pdf.

MS4 Permit regulations.

NPDES General Construction Permit regulations.

Porter-Cologne Water Quality Control Act of 1969.

PRC Section 5097.98.

RIO District Ordinance.

SCAG. 2016. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Available at: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557.

South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan (AQMP). March 2017. Available at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

Southern California Association of Governments, 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, or "Connect SoCal" available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

State of California Antidegradation Policies – State Water Resources Control Board Resolution 68--16.

APPENDICES

Other than the general corrections and additions and other applicable corrections provided above, no specific corrections or additions have been made to Appendices A through D, Appendices F through I, Appendices K through M, Appendices O through P, and Appendix R of the Draft EIR. Specific clarifications and/or additions to Appendices E, J, and N are discussed below.

APPENDIX E BIOLOGICAL RESOURCES ASSESSMENT

In addition to the general additions and corrections provided above, revise Appendix E, Biological Resources Assessment, as follows:

Page 19, revise the third to last sentence of the third paragraph as follows:

> The Ordinance requires replacement of protected trees at a ~~2:1~~ 4:1 ratio, and the size and number of replacement trees shall approximate the value of the tree to be replaced.

Page 19, add the following footnote to the first sentence of the last paragraph,

> A tree inventory report was prepared by Carlberg Associates (2022) for the Project alignment, including the areas along the alignment between Project components, and is included as Appendix B.[6]

Footnote 6: Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022 tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 21, revise the second paragraph as follows:

AECOM biologist Art Popp conducted a field survey of the proposed Project alignment on April 1, 2020, to document and photograph existing biological resources. Weather conditions during the survey included temperatures ranging between 67 to 72 degrees Fahrenheit, clear skies, and wind generally 1 to 3 miles per hour. A ~~follow up~~ second survey to verify and record tree species occurring within the Project component footprints was conducted on April 24, 2021. A third survey was performed on March 23, 2023 to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. This survey effort is discussed in greater detail in Appendix G, Supplemental Biological Resources Report, of the Final EIR. Results of the field surveys were used to determine the presence of biological resources such as sensitive ecological areas, wetlands, wildlife migratory corridors, and/or conserved areas within the Project area and if those areas could potentially support special-status species and sensitive communities identified during the literature review.

Page 40, revise the first sentence of the second paragraph as follows:

~~Both~~ All three field surveys were conducted during the bird breeding season, generally considered to extend from February 1 through September 30, or as early as December or January through July for raptor species.

Page 45, revise the second paragraph as follows:

Table 6-1 presents the number of trees within the Project alignment that would be impacted by construction of the Project and are proposed for removal. These trees are identified as "Protected Trees," 'significant' trees' as defined by the City's Planning Division, street trees occurring within the public ROW, trees occurring on Los Angeles State Historic Park property, and trees within the SR-110 Caltrans ROW. Based upon field surveys conducted on April 24, 2021, and a review of the March 28, 2022, tree report, included as Appendix B of Appendix E of the Draft EIR, and the Updated Tree Report, included as Appendix K.1 of the Final EIR, 250 trees along the Project alignment are proposed for removal and 10 trees that were inventoried will be preserved. A list of the trees identified at Project component sites proposed for removal with the diameter at 4.5 feet (DBH), tree height information, canopy spread, health, structure, and regulatory status are provided in Table 10, Appendix B.

Page 47, revise the third paragraph as follows:

The Project would incorporate BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction which are not identified to be removed but are either within the construction footprint or in close proximity to the construction footprint. In addition, the Project would incorporate BIO-PDF-F and would comply with applicable tree replacement requirements,

based on the jurisdiction of the property where each tree is located. The Project ~~proposes to~~ would replace trees located on the California Department of Parks and Recreation State property and private property at a 1:1 ratio, with a minimum of 24-inch box tree within the Project area, or at another location within the City.

Page 50, revise section 7.0 Project Design Feature as follows:

7.0 Project Design Features

In addition to those requirements set forth in the regulatory documents, the following Project Design Feature (PDF) provides additional environmental benefits and further reduces risks associated with biological resources: BIO-PDF-A The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.

The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:

(1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.

(2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.

(3) Annual reporting criteria and requirements.

BIO-PDF-C: Cabin Window Features.

The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.

BIO-PDF-D:

The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

BIO-PDF-E: Tree Disease Management.

Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.

BIO-PDF-F:

The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:

- City of Los Angeles:
  - "Protected" Trees: 4:1
  - Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
  - "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1)
- California Department of Parks and Recreation: At least 1:1
- Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1

BIO-PDF-G:

Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

BIO-PDF-H:

Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may

cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trashcans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

Page 51, revise the first bullet point as follows:

- If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season when the young are self-sufficient.

Page 51, revise the final bullet point as follows:

- Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal.

APPENDIX J GREENHOUSE GAS EMISSIONS TECHNICAL REPORT

In addition to the general additions and corrections provided above, revise Appendix J, Greenhouse gas Emissions Technical Report, as follows:

Page 2, revise the fourth paragraph as follows:

Operational power requirements can be separated into two categories: normal operations and emergency operations. Power requirements for one hundred percent of the power for the Project would be provided by the City of Los Angeles Department of Water and Power's (LADWP's) Green Power Program, as described in GHG-PDF-A, through a connection to their power grid, and would include the power to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). When operating at capacity, normal operations are estimated to require a total of approximately 2.5 megawatts of power.

Page 2, revise the sixth paragraph as follows:

The Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers. The electrical power for the Project would be supplied by LADWP through the utility's Green Power Program, as described in GHG-PDF-A. Accordingly, the primary electricity usage associated with the Project would come from renewable resources. In addition, the Project would install backup battery

storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event of a temporary power grid failure.

Page 27, revise the last paragraph as follows:

Project-related electricity use can result in indirect emissions, due to electricity generation activities occurring at off-site power plant locations. For this Project, the electrical power for operation of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP under the utility's Green Power Program, as described in GHG-PDF-A. As a result, the primary electricity usage associated with the Project would come from renewable resources.

Page 32, revise the sixth paragraph as follows:

The emissions reduced associated with the Project's commitment to obtaining power through LADWP's Green Power Program, as described in GHG-PDF-A, was quantified using the expected power consumption of the aerial gondola system and the GHG intensity factors for LADWP's standard power portfolio. The emissions of GHGs reduced were converted to CO2e using global warming potentials from the Intergovernmental Panel on Climate Change Fourth Assessment Report and are shown in **Table 4-8**.

Table 4-8: GHG Emissions Reduced Associated with Gondola System Electricity Usage, revise table note 5 as follows:

[5] Emissions are shown as negative to represent the emissions benefit gained by the Project by committing to LADWP's Green Power Program, as described in GHG-PDF-A, which is supplied by 100% renewable resources.

Table C-1, revise row 1 as follows:

1	California Renewables Portfolio Standard (RPS) and SB 350	As most recently amended by SB 100 (2018), California's RPS increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020; 50 percent renewable power by 2026; and, 60 percent renewable power by 2030. SB 350 (2015) also requires the State Energy Resources Conservation and Development Commission to double (by 2030) the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	**Consistent.** Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, as described in GHG-PDF-A. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state's RPS or the energy efficiency and conservation targets of SB 350. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-pdoc?_adf.ctrl-state=rmkf94oql_25&_afrLoop=764064428747531.)

Table C-2, revise row 1 as follows:

SB 350	Reduce GHG emissions in the electricity sector through the implementation of the 50 percent Renewables Portfolio Standard (RPS), doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan (IRP) process.	**Consistent.** Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, as described in GHG-PDF-A. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state's RPS or the energy efficiency and conservation targets of SB 350. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-pdoc?_adf.ctrl-state=rmkf94oql_25&_afrLoop=764064428747531.)

Table C-4, revise row 1 as follows:

E-1 Renewable Energy Procurement	Expand use of renewable energy in electricity procurement (100% renewable electricity by 2035)	**Consistent.** Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, as described in GHG-PDF-A. As such, the primary electricity usage associated with the Project would come from renewable resources. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-pdoc?_adf.ctrl-state=rmkf94oql_25&_afrLoop=764064428747531.)

Table C-4, revise row 2 as follows:

F-1 Photovoltaic Installations	Increase on-site solar photovoltaic installations	**Consistent.** The Project supports use of renewable power generation and use by committing to use green power from LADWP's Green Power Program, as described in GHG-PDF-A. As such, the primary electricity usage for the Project would come from renewable resources.

APPENDIX N RIDERSHIP MODEL DEVELOPMENT MEMORANDUM

In addition to the general additions and corrections provided above, revise Appendix N, Ridership Model Development Memorandum, as follows:

Page 2, revise the second paragraph as follows:

> For example, driving costs include the cost of gas and parking at Dodger Stadium, which averaged around $25.00 per vehicle in 2019. Transit costs include the cost of fares, such as Metro's $1.75 one way fare, and assuming no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year. Both driving and taking transit take time, which will depend on where people going to a Dodger Game start their trip, levels of congestion, and the transportation mode that they take. For example drive time to Dodger Stadium gates from zip code 91103 (Old Pasadena) is approximately 25 minutes, with an additional 15 minutes for vehicles to make it through the parking gates to a parking space. Transit to Union Station takes approximately 22 minutes, with an additional 25 minutes for riders to get to the Dodger Stadium Express and ride to Dodger Stadium. The proposed Project is expected to save about 15 minutes of transit travel time in total.

Page 7, revise the last row as follows:

Transit	The model transit fare assumption for Metro was $1.75 per ride, and the 2019 Metrolink distance-based fare for each station origin within a particular zip code were included in the model calculated transit travel cost. The model assumes no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year.	$1.75 (2019)	$1.75 (2019)

5.3 EFFECT OF CORRECTIONS AND ADDITIONS

The Final EIR documents changes to the Draft EIR. As demonstrated by the following discussion, the modifications to the Draft EIR do not result in new significant impacts and do not warrant recirculation of the Draft EIR. CEQA Guidelines section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document. The relevant portions of CEQA Guidelines section 15088.5 read as follows:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant

> new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
>
> (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)
>
> (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in this section and Section 6.0, Responses to Comments, of this Final EIR, clarifies, amplifies, or makes insignificant changes to the Draft EIR. Section 6.0, Responses to Comments, of this Final EIR, fully considers and responds to comments claiming that the proposed Project would have significant impacts or more severe impacts not disclosed in the Draft EIR and demonstrates that none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR. In addition, the information added to the Draft EIR is not significant because the Draft EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project. Rather, as provided by the following discussion, the corrections and additions to the Draft EIR would not result in new significant impacts or an increase in any impact already identified in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met.

General Corrections and Additions

The general corrections and additions above do not constitute new significant information resulting in new or more severe significant environmental impacts. The general corrections and additions provide an analysis of the proposed Project's consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines, confirmation of the LADWP's ability to provide power for the proposed Project through the LADWP's Green Power Program, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station. The Dodger Stadium Station mobility hub was included within the Draft EIR's analysis. The general corrections and additions also note that the CEQA streamlining provisions provided in SB 44 were extended subsequent to the release of the Draft EIR in SB 91, but no substantive provisions in SB 44 were

altered, and accordingly references to SB 44 also refer to SB 91. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result from these general corrections and additions.

Aesthetics

As set forth in the general corrections and additions above, in response to comments on the Draft EIR, updated and additional KOPs were prepared to support evaluation of potential impacts of the proposed Project on aesthetics and visual resources. The supplemental KOPs were updated to clarify certain design elements of the proposed Project, and additional visual simulations were also provided. As discussed in Section 5.1, above, the evaluation of updated and additional KOPs for the proposed Project does not result in significant impacts, and the aesthetic impacts of the proposed Project would be less than significant. Thus, no new impacts would result and impacts would continue to be less than significant.

Agriculture and Forestry Resources

There are no text changes proposed to Section 3.02, Agriculture and Forestry Resources, of the Draft EIR, other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Air Quality

There are no text changes proposed to Section 3.03, Air Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Biological Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to clarify the criteria for the Tree Inventory Report's inventory and to update the inventory accordingly, to reference an additional survey conducted in responses to comments received on the Draft EIR, and to provide additional clarifying analysis that expands upon the analysis in the Draft EIR based on comments received. The changes otherwise incorporate additional Project Design Features at CDFW's request that provide additional environmental benefits for biological resources, and the additional survey confirmed the analysis provided in the Draft EIR. The additional clarifications also expand upon the analysis provided in the Draft EIR, and do not alter any of the Draft EIR's conclusions. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Cultural Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites in the applicable mitigation measures. This revision is consistent with CEQA Guidelines section 15126.4(b), and merely restates an existing requirement. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Energy

There are no text changes proposed to Section 3.06, Energy, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Geology and Soils

Text changes constitute minor corrections or clarifications to the Draft EIR. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Greenhouse Gas Emissions

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant.

Hazards and Hazardous Materials

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure HAZ-A to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that MM-HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Further, Appendix M, Potential Excavated Material Disposal Analysis, of this Final EIR, provides additional, clarifying information regarding potential disposal of excavated material. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Hydrology and Water Quality

There are no text changes proposed to Section 3.10, Hydrology and Water Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Land Use and Planning

As set forth in the general corrections and additions above, additions include analysis of the proposed Project's consistency with various land use plans. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every

plan or policy, and the consistency analysis has been provided for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Mineral Resources

There are no text changes proposed to Section 3.12, Mineral Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Noise

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure VIB-A to specify that the vibration monitoring equipment would be placed at a distance of "approximately 26 feet" rather than "at least 26 feet" from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery. The general corrections and additions above include a discussion of Appendix L, 3S Sound Measurements Memo, of the Final EIR, is a memorandum from Leitner Poma providing additional detail on the operational noise from the 3S gondola system in Tyrol, Austria at the Stubai Glacier. This memorandum was provided as an update to a prior memorandum from Leitner Poma about its 3S gondola system, which is included in the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Appendix L, 3S Sound Measurements Memo, of the Final EIR provides additional detail about the Leitner Poma 3S gondola system but does not change any of the information previously provided as part of the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Thus, no new or more severe significant impacts would result and construction impacts would continue to be significant and unavoidable as set forth in the Draft EIR and operational impacts would continue to be less than significant as set forth in the Draft EIR.

Population and Housing

There are no text changes proposed to Section 3.14, Population and Housing, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Public Services

There are no text changes proposed to Section 3.15, Public Services, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Parks and Recreational Facilities

Text changes to Section 3.16, Parks and Recreational Facilities, of the Draft EIR include minor typographical corrections in addition to the general corrections and additions outlined above. Thus, no new impacts would result and impacts would continue to be less than significant.

Transportation

As set forth in the general corrections and additions above, revisions include refinements to Mitigation Measure TRA-A to identify the mitigation for each identified location, consistent with the analysis in the

Draft EIR, and to incorporate TRA-PDF-A, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility. In addition, the general corrections and additions provide an analysis of the proposed Project's consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines and clarification regarding ridership model assumptions, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station following additional consultation with the Los Angeles Dodgers. The Dodger Stadium Station mobility hub was included within the Draft EIR's analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Tribal Cultural Resources

There are no text changes proposed to Section 3.18, Tribal Cultural Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Utilities and Service Systems

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Wildfire

Text changes constitute minor corrections or clarifications to the Draft EIR to fix typographical errors. In addition, to the general corrections and additions outlined above, the general additions include an overview of Appendix J, Reax Memo re Attorney General Guidance to the Final EIR, which provides a discussion of the Draft EIR analysis' consistency with the October 2022 Attorney General guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant.

Alternatives

Text changes constitute minor corrections or clarifications to the Draft EIR, including to correct minor typographical errors in the proposed Project impacts summary, to add additional information regarding the TSM Alternative, to add additional information regarding an alternative that was considered but dismissed from further consideration (the Pedestrian Enhancement Alternative) because it would not meet most of the project objectives to the same degree as the proposed Project, and to provide additional information related to biological resources, hazards, and transportation related to the adoption of additional project design features and refinements to mitigation measures described above. In addition, clarifying revisions have been provided for the Spring Street Alignment Alternative's Mitigation Measure TRA-A to specify the visibility enhancements required to mitigate geometric hazards for site visibility for pedestrians. Further, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Spring Street Alignment Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park. Thus, no new impacts would result and no new feasible alternatives have been identified.

Other CEQA Considerations

Text changes constitute minor corrections or clarifications to the Draft EIR, including to add a discussion of project design features and make clarifications consistent with those described above for Mitigation Measure HAZ-A, and to add a discussion regarding Chavez Ravine and the Project Sponsor's commitment to develop an interpretation plan with stakeholder groups. This addition merely expands upon information provided in the Draft EIR for informational purposes. The general corrections and additions also provide an overview of how the proposed Project would not impair or impact potential recreational uses of the Alameda Triangle anticipated by The California Endowment, as well as how the proposed Project alignment would not require aerial rights requirements over 130 West College Street, where subsequent the publication of the Draft EIR, an application for an office building was filed. Thus, no new impacts would result.

Design and Use Options

Text changes constitute minor corrections or clarifications to the Draft EIR, including to provide specific information regarding the extent of parking removal under Design Option A. Parking is not a required transportation analysis under CEQA, and the additions provide an analysis of consistency with the Dodger Stadium CUP, concluding that Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation. In addition, the Final EIR provides additional detail as to the public ROW, publicly owned property, and private properties for Design Options A and B in Appendix P, Design Option A Plan and Profile and Appendix Q, Design Option B Plan and Profile, respectively. Thus, no new impacts would result.

Other Sections

Text changes to other sections of the Draft EIR constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Appendices

Text changes to the Draft EIR's appendices constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Conclusion

Based on the above, the corrections and additions, which include proposed refinements to the proposed Project, do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR. In addition, the corrections and additions to the Draft EIR clarify, amplify or make insignificant refinements to the Draft EIR. Further, for many issue areas, the proposed corrections and additions would reduce impacts set forth in the Draft EIR. Thus, recirculation of the Draft EIR is not required.

Section 6.0 | Responses to Comments

6.1 INTRODUCTION

Section 15088(a) of the CEQA Guidelines states that the "lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." This section of the Final EIR provides a list of persons, organizations, and public agencies that commented on the Draft EIR, along with responses of the Lead Agency to significant environmental points raised in the review and consultation process.

The Draft EIR was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review from October 17, 2022 to January 17, 2023.

This Section 6.0, Responses to Comments, includes: Section 6.1, Introduction, Section 6.2, Topical Responses, and Section 6.3, Responses to Comments, which includes responses to all comments received on the Draft EIR during the Draft EIR public review period.[1] In addition, verbal comments made at the virtual February 8, 2023, public hearing were deemed timely submitted for the purposes of the Draft EIR comment period and are responded to in this Section 6.0.[2]

In accordance with Section 15088(c) of CEQA, reasoned, factual responses have been provided to all comments received during the Draft EIR public review period, with a particular emphasis on significant environmental issues. The comments and responses are organized as follows: state agencies ("S"), local agencies ("L"), groups and organizations ("GO"), individuals ("P"), and verbal and written comments received during the four Draft EIR public hearings ("PH"). All comments and responses to comments are included in this Final EIR and will be considered by the Metro Board prior to certification of this EIR and in any approval of the proposed Project.

Each comment letter, email, voicemail, and public hearing verbal or written comment, have been assigned a number in addition to a letter corresponding to the categories described above. The body of each comment letter, email, voicemail, and public hearing verbal or written comment, has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in, for example, Comment Letter GO1 is depicted as Comment GO1-1, and so on. Copies of each comment letter, email, voicemail, and public hearing written comment, are provided in Appendix C, Public Comments on the Draft EIR, of this Final EIR. Copies of the transcripts of each verbal comment received during public hearings, are provided in Appendix B, Public Hearing Transcripts, of this Final EIR. All of the comments received are listed in Table 6-1 below, which provides a list of those parties that provided written comments on the Draft EIR during the public review period. Refer to Section 3.0, Project Description, for revisions to the proposed Project, and Section 5.0, Corrections and Additions, for specific additions and corrections to the Draft EIR made in the Final EIR.

[1] Certain Topical Responses in Section 6.2 and responses to comments in Section 6.3 include footnotes citing to or discussing reference materials. The reference materials are available on the proposed Project's SB 44 website. Two documents, the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment* and the Parking Study, are referenced frequently throughout Section 6.3, Responses to Comments, but are not provided in footnotes because of the frequency with which they are cited. These documents were prepared by Fehr & Peers and are available on the proposed Project's SB 44 website.

[2] As discussed in Topical Response A, SB 44, in light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023, after the public review period closed on January 17, 2023.

Table 6-1: Comments from Public Agencies, Groups, Organizations, and Individuals

Letter	Name (title)	Organization/Address	Date of Letter
State Agencies (S)			
S1	Erinn Wilson-Olgin, Environmental Program Manager I, South Coast Region; Felicia Silva, Environmental Scientist	California Department of Fish and Wildlife (CDFW) South Coast, Region 5 Habitat Conversation Planning Program 3030 Old Ranch Parkway, Suite 400 Seal Beach, CA 90740	January 14, 2023
S2	Jason De Wall, Northern Field Division Chief	California Department of Parks and Recreation 1925 Las Virgenes Road Calabasas, CA 91302	January 17, 2023
S3	J.I. Perry, Captain Commander; Sergeant Jaime L. Allen	Department of California Highway Patrol Central Los Angeles Area 777 West Washington Blvd Los Angeles, CA 90015	January 13, 2023
S4	Miya Edmonson, IGR/CEQA Branch Chief; Anthony Higgins, Associate Transportation Planner	Department of Transportation District 7, Division of Planning (Caltrans) 100 S. Main Street, MS-16 Los Angeles, CA 90012	January 17, 2023
S5	Kimberly M. Johnson, Tribal Secretary	Gabrieleno/Tongva San Gabriel Band of Mission Indians P.O. Box 693 San Gabriel, CA 91778-0693	January 30, 2023
Local Agencies (L)			
L1	Evelyn Aguilar, Air Quality Specialist	South Coast Air Quality Management District (SCAQMD) 21865 Copley Drive Diamond Bar, CA 91765	October 20, 2022
L2	Matthew W. Szabo, City Administrative Officer	City of Los Angeles 200 North Main Street, Suite 1500 Los Angeles, CA 90012-4137	January 7, 2023
Groups and Organizations (GO)			
GO1	Phyllis Ling Outreach Committee Chair / Solano Canyon Resident Representative	Historic Cultural North Neighborhood Council 200 N. Spring Street Los Angeles, CA 90012	December 12, 2022
GO2	Jessica Lall, President & CEO	Central City Association of Los Angeles, (CCA) 626 Wilshire Blvd., Suite 850 Los Angeles, CA 90017	December 12, 2022
GO3	Darrel A. Sauceda, Chief Operating Officer	Los Angeles Latino Chamber of Commerce 8531 Wellsford Place, Ste. E Santa Fe Springs, CA 90670	December 14, 2022
GO4	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	November 22, 2022

Letter	Name (title)	Organization/Address	Date of Letter
GO5	Raymond Su, President, Board of Directors Michelle Jong, Past President, Chinese Family History Group Clayton Frech, CEO and Founder, Angel City Sports David Kent, Gold President, Bicycle Angels Evelyn Lee, President, Chinese Family History Group Jose J. Hernandez, Principal, Ann Street Elementary Lisa Loo, Director – Community Services Jorge Parra, Jr., Educator	Los Angeles Chinatown Firecracker Run Committee, Inc. P.O. Box 86132 Los Angeles, CA 90086	August 12, 2022
GO6	Dennis J. Huang, Executive Director & CEO	Asian Business Association 767 N. Hill Street, Ste. 308 Los Angeles, CA 90012	December 7, 2022
GO7	Kellie Hawkins Davis, Climate Resolve Board Member	Climate Resolve 525 S. Hewitt Street Los Angeles, CA 90013	December 18, 2022
GO8	John Given, Law Office of John P. Given	LA Parks Alliance 1855 Industrial Street, #106 Los Angeles, CA 90021	December 21, 2022
GO9	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 5, 2023
GO10	Rachel Norton, Executive Director	California State Parks Foundation 33 New Montgomery Street, Suite 520 San Francisco, CA 94105	January 9, 2023
GO11	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 17, 2023
GO12	Barbara Hensleigh, Chair, Central Group (Los Angeles)	Sierra Club 1000 Alameda Street Los Angeles, CA 90012	January 17, 2023
GO13	Paulina Torres, Staff Attorney Damon Nagami, Senior Attorney	Natural Resources Defense Council (NRDC) 1314 2nd Street Santa Monica, CA 90401	January 17, 2023
GO14	John Given, Law Office of John P. Given	LA Parks Alliance 2309 Santa Monica Blvd., #438 Santa Monica, CA 90404	January 17, 2023
GO15	Thomas J Vozzo, CEO; Steve Delgado, COO	Homeboy Industries 130 W. Bruno Street Los Angeles, CA 90012	January 18, 2023
GO16	Adrian Scott Fine, Senior Director of Advocacy	Los Angeles Conservancy 523 W. Sixth Street, Ste. 826 Los Angeles, CA 90014	January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
GO17	Douglas P. Carstens	The California Endowment (TCE) 1000 N. Alameda Street Los Angeles, CA 90012	January 17, 2023
GO18	Dr. Clyde T. Williams, President	Coalition for a Safe Community 4117 Barrett Rd. Los Angeles, CA 90032-1712	January 12, 2023
GO19	Maria S. Salinas, President & CEO	Los Angeles Area Chamber of Commerce 350 S. Bixel Street Los Angeles, CA 90017	January 1, 2023
GO20	The Board of ADCCLA Laura, Yuval, Gabrielle, Harley, Tim, David, and Todd Terrazas	Arts District Community Council (ADCCLA) 1855 Industrial Street, #106 Los Angeles, CA 90021	January 3, 2023
GO21	Kathleen Johnson, Executive Director	Los Angeles River State Park Partners 1799 Baker Street Los Angeles, CA 90012	January 4, 2023
GO22	Richard A. Rojas, Sr., Immediate Past-Chairperson	Latino Outdoors 1000 Broadway, Suite 480 Oakland, CA 94607	January 18, 2023
GO23	Conchita Marusich, President	Old Spanish Trail Association (OSTA) 4824 Guadalupe Trail Albuquerque, NM 87107	January 17, 2023
GO24	Jon Christensen, Adjunct Assistant Professor	3323 Public Affairs Building, Box 951656 Los Angeles, CA 90095-1656	January 17, 2023
GO25	Barbara Broide, Co-President Wendy-Sue Rosen, Co-President	Coalition for a Beautiful Los Angeles (CBLA) 200 S. Barrington Ave., Box 49583 Los Angeles, CA 90049	January 17, 2023
GO26	Gay Q. Yuen, Ph.D., Board Chair	The Chinese American Museum 425 N. Los Angeles Street Los Angeles, CA 90012	January 18, 2023
GO27	Robin Mark, Los Angeles Program Director	Trust for Public Land 135 W. Green Street, Suite 200 Pasadena, CA 91105	January 18, 2023
GO28	David Carle, President	California State Park Rangers Association (CSPRA) P.O. Box 39 Lee Vining, CA 93541	December 20, 2022
GO29	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	January 12, 2023
GO30	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	December 31, 2022
GO32	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	October 13, 2022
GO33	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	October 13, 2022

Letter	Name (title)	Organization/Address	Date of Letter
GO34	Thomas R Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	October 22, 2022
GO35	Martha I. Jimenez, Executive Vice President / General Counsel / Secretary	The California Endowment (TCE) 10000 North Alameda Street Los Angeles, CA 90012	October 7, 2022
GO36	David Carle, President	California State Park Rangers Association (CSPRA) PO Box 39 Lee Vining, CA 93541	October 14, 2022
Individuals (P)			
P1	Topher Hendricks		October 17, 2022
P2	Bert Glatstein		October 17, 2022
P3	Israel Vasquez		October 17, 2022
P4	Riley McNair		October 18, 2022
P5	Jack Humphreville		October 18, 2022
P6	James Martin		October 18, 2022
P7	Alexander M Kargher		October 18, 2022
P8	Margaret Light		October 20, 2022
P9	Aram Hacobian		October 21, 2022
P10	Brian VanRiper		October 21, 2022
P11	Rachel Orfila		October 21, 2022
P12	Jean Albrick		October 22, 2022
P13	Jack Reed		October 23, 2022
P14	Charles W. Ben		October 23, 2022
P15	Tanner Vandenbosch		October 24, 2022
P16	Michael Smith		October 24, 2022
P17	Lynn Miller		October 24, 2022
P18	Joshua Rangel		October 24, 2022
P19	Mark Staples		October 24, 2022
P20	Ding Kalis		October 24, 2022
P21	Sarah Back		October 24, 2022
P22	Cat Nick		October 24, 2022
P23	Chase Paules		October 24, 2022
P24	Stephanie Pincetl		October 24, 2022
P25	Neil Larsen		October 24, 2022
P26	Matt Schodorf		October 24, 2022
P27	David Fried		October 24, 2022
P28	Michael Bauer		October 25, 2022
P29	Yasmin Grewal-Kok		October 25, 2022
P30	Mark Whitney		October 25, 2022
P31	Samantha Smith		October 25, 2022
P32	Kyle Martin		October 25, 2022
P33	Robert Smolkin		October 26, 2022
P34	Steve Cokonis		October 26, 2022
P35	Neal Roscoe		October 26, 2022
P36	Tami Kagan-Abrams		October 26, 2022
P37	Grant Blakeman		October 27, 2022
P38	Matthew Mier		October 28, 2022
P39	*Comment number intentionally skipped*		

Letter	Name (title)	Organization/Address	Date of Letter
P40	Abe Ahn		October 30, 2022
P41	Perrin Shannon		November 7, 2022
P42	Carleigh Shannon		November 7, 2022
P43	Katharina Schmitz	Doppelmayr USA	November 9, 2022
P44	Darren Howell		November 15, 2022
P45	Jeffrey Holmes		November 15, 2022
P46	Jack Humphreville		November 16, 2022
P47	Julia Tauscher		November 17, 2022
P48	Bill Przylucki		November 17, 2022
P49	Faraz Aqil		November 19, 2022
P50	Greg Camphire		November 23, 2022
P51	Daniel Freedman		November 23, 2022
P52	Marceline Phillips		November 28, 2022
P53	Martin Hoecker-Martinez		November 28, 2022
P54	Baldomero Capiz		November 17, 2022
P55	Ruby Andalon		November 17, 2022
P56	Rebecca Ocegueda		November 17, 2022
P57	Maria Yglesias		November 17, 2022
P58	Arturo Gonzalez		November 17, 2022
P59	Kevin Jauregui		November 17, 2022
P60	Julie Rico		November 17, 2022
P61	Patrick Chen		November 17, 2022
P62	Davanna Molinari		November 17, 2022
P63	Bill Chin		November 17, 2022
P64	Frank Hom		November 17, 2022
P65	Raul Macia & Francisco Serrano		November 18, 2022
P66	Herminia G. Andrade		November 17, 2022
P67	Alan K. Weeks		November 17, 2022
P68	Antonio Rodriguez		November 17, 2022
P69	Samuel Perez		September17, 2022
P70	Ci Zhang Maory		November 17, 2022
P71	Ramon Cruz Moya		November 17, 2022
P72	Joseph Amaral		November 17, 2022
P73	Daniel Andalon		November 18, 2022
P74	Chace Espinosa		November 30, 2022
P75	Franco Stefano Blancaflor		November 30, 2022
P76	Jacob Lopez		November 30, 2022
P77	DJ Gonzalez		November 30, 2022
P78	Xavier Garcia		November 30, 2022
P79	Cayla McCrae		December 1, 2022
P80	Thomas Lemos		December 1, 2022
P81	Marissa Roy		December 1, 2022
P82	Tabatha Yelos		December 1, 2022
P83	Logan Rapp		December 1, 2022
P84	Amy Gatto		December 1, 2022
P85	Akio Katano		December 1, 2022
P86	Timothy Hayes		December 1, 2022
P87	Anthony Weiss		December 2, 2022
P88	Betty Doumas-Toto		December 2, 2022
P89	Eli Jacobovitz		December 2, 2022
P90	Jennifer Lei		December 2, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P91	Melody McBride		December 2, 2022
P92	Gizelle V zquez		December 2, 2022
P93	Dylan Kirk		December 2, 2022
P94	Cole Barrios		December 2, 2022
P95	Ashley Harmon		December 2, 2022
P96	Annie Freiermuth		December 2, 2022
P97	Peter Kwong		December 3, 2022
P98	Ben Kolstad		December 6, 2022
P99	Ray Melendez		December 6, 2022
P100	Micah Enloe		December 6, 2022
P101	Steve Mirkin		December 7, 2022
P102	Edgar Mendez		December 7, 2022
P103	Gabriella Nieves		December 7, 2022
P104	Wendy Whitcup		December 7, 2022
P105	Phyllis Ling		December 7, 2022
P106	Jack Tovar		December 7, 2022
P107	Nancy Hoven		December 8, 2022
P108	Miguel Nisthal		December 8, 2022
P109	Mike Connors		December 8, 2022
P110	Karin Costello		December 8, 2022
P111	Ben Park		December 9, 2022
P112	Desmond Bliek		December 9, 2022
P113	Ovo Xxx		December 9, 2022
P114	Hugo Garcia		December 9, 2022
P115	Phyllis Ling		December 9, 2022
P116	Schenae Rourk		December 10, 2022
P117	Christian D. Návar		December 10, 2022
P118	Celeste Salazar		December 10, 2022
P119	Anna Menedjian		December 10, 2022
P120	Casa Wilson		December 10, 2022
P121	Renee Young		December 11, 2022
P122	Katherine Chrisman		December 11, 2022
P123	Daren Cole, President	Leitner-Poma of America, Inc.	December 11, 2022
P124	Lauren Fortner		December 12, 2022
P125	Tara Kays		December 12, 2022
P126	Jessica Wong		December 12, 2022
P127	Abraham Mercado		December 12, 2022
P128	Min Polley		December 12, 2022
P129	Sharon Coleman		December 13, 2022
P130	Navid Nakhaee		December 13, 2022
P131	Alejandro Herrera		December 13, 2022
P132	Michelle Liu		December 03, 2022
P133	Juniper Wong		December 14, 2022
P134	Desiree Lenart		December 14, 2022
P135	Jorge Leandros Tovar		December 14, 2022
P136	Diane Weiss		December 15, 2022
P137	Miguel Haro Jr.		December 15, 2022
P138	Veronica Corona		December 16, 2022
P139	Jay Adriano		December 16, 2022
P140	A. Catherine Norian, DLA Piper LLP	Chinatown Station Owner, LLC	December 16, 2022
P141	Bill Haller		December 17, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P142	Justin Carrus		December 17, 2022
P143	Nidhi Nikhanj		December 18, 2022
P144	Jasvinder Bawa		December 18, 2022
P145	Ralph Levinson		December 18, 2022
P146	Susan Levinson		December 18, 2022
P147	Brenda Nuyen		December 19, 2022
P148	Dylan Sittig		December 20, 2022
P149	Daniel Liu		December 19, 2022
P150	Amy Hammond		December 19, 2022
P151	Jodi Sklawer		December 19, 2022
P152	Carolyn Weyant		December 20, 2022
P153	Aronriti Mey		December 7, 2022
P154	YueHan Kuang		December 9, 2022
P155	HZ Liu Zhang		December 7, 2022
P156	Chuong Zin Bo		December 7, 2022
P157	George Lui		December 7, 2022
P158	Sher Yuek Tan		December 7, 2022
P159	Huang Jing		December 7, 2022
P160	Qing HNG		December 7, 2022
P161	RM HU		December 7, 2022
P162	Qui Lui		December 7, 2022
P163	Za Ling Zi		December 7, 2022
P164	Yi Yang		*No date*
P165	Wu Xiong Lui		December 7, 2022
P166	Rui Fang Feng		November 7, 2022
P167	Guohui Li		December 7, 2022
P168	Li Jun Yue		December 7, 2022
P169	Annie Ma		December 7, 2022
P170	Jose Silva		December 7, 2022
P171	Kiet Tsan		November 7, 2022
P172	Alex Diaz		November 9, 2022
P173	Elena		September 12, 2022
P174	Maria Baeza		September 12, 2022
P175	Choo Hue Ling		*No date*
P176	Wences Sanchez		December 9, 2022
P177	Isabel Dimas		December 9, 2022
P178	Araceli Morales		December 9, 2022
P179	Disraeli Butler		December 9, 2022
P180	Maria Alvarez		December 9, 2022
P181	Louie Chan		December 9, 2022
P182	Amparo Cabrera		December 9, 2022
P183	Socorro Lugo		December 9, 2022
P184	Lan To		December 9, 2022
P185	Sandra Sedano		December 9, 2022
P186	Marta Prieto		December 9, 2022
P187	Kin Tsan		December 7, 2022
P188	Edward Elias		December 7, 2022
P189	Edgar Ramos		December 7, 2022
P190	Wendy Ortiz		December 7, 2022
P191	Nazario Arreola		*No date*
P192	Mariana Gomez		December 9, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P193	Karina		December 7, 2022
P194	Gustavo Gonzalez		December 7, 2022
P195	Taylor Nichols		December 22, 2022
P196	Mitchell Mom		December 23, 2022
P197	Francis Hayes		December 29, 2022
P198	Jennifer Cuevas		December 30, 2022
P199	Allen Mom		December 31, 2022
P201	Jay de la Torre		January 4, 2023
P202	Derrick Davis		January 4, 2023
P203	Jennifer Lee		January 4, 2023
P204	Peter Saudino		January 4, 2023
P205	Brian Herrera		January 4, 2023
P206	Veronica L.		January 5, 2023
P207	Nathaniel Ortiz		January 3, 2023
P208	Peter Shek		January 6, 2023
P209	Peter Shek		January 6, 2023
P210	Jean Brandt		January 6, 2023
P211	Kristen Wo		January 6, 2023
P212	Andrea Valverde		January 6, 2023
P213	Manori Sumanasinghe		January 6, 2023
P214	Reagan McClymonds		January 6, 2023
P215	Thomas Britt		January 6, 2023
P216	Hayley Marcus		January 6, 2023
P217	Nancy Hoven		January 6, 2023
P218	Ann Dorsey		January 6, 2023
P219	Janna Wheeler		January 6, 2023
P220	Kate Wolf		January 6, 2023
P221	Polonia		January 6, 2023
P222	Jean Brandt		January 7, 2023
P223	Paul Newman		January 7, 2023
P224	Lance Paris		January 7, 2023
P225	Elizabeth Codiga		January 7, 2023
P226	Nelson Abreu		January 7, 2023
P227	Mary Koetting		January 7, 2023
P228	Catherine Wu		January 7, 2023
P229	Emily Moncata		January 8, 2023
P230	Bert Glatstein		January 8, 2023
P231	Jamie Patterson		January 9, 2023
P232	Jane O'Neill		January 9, 2023
P233	Laurel Randolph		January 9, 2023
P234	Jill Stevens		January 9, 2023
P235	Dorothy Braudy		January 9, 2023
P236	Max Maslansky		January 9, 2023
P237	Julie Williams		January 9, 2023
P238	Aristotle Acevedo		January 9, 2023
P239	Kama Hayes		January 10, 2023
P240	Christian Arana		January 10, 2023
P241	Dylan Sittig		January 10, 2023
P242	Aaron Y		January 10, 2023
P243	Daniel Samiljan		January 10, 2023
P244	William Campbell		January 10, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P245	Nicholas De Dominic		January 10, 2023
P246	Tyler Tharp		January 10, 2023
P247	Andrew Mueth		January 10, 2023
P248	Jules Cote		January 10, 2023
P249	Sophie Li		January 11, 2023
P250	Kate Wolf		January 9, 2023
P251	Sarajo Frieden		January 11, 2023
P252	Bob Vanderet		January 11, 2023
P253	Tom Williams		January 11, 2023
P254	Gloria Ramirez		January 11, 2023
P255	Melissa Arechiga		January 13, 2023
P256	Carol Ng		January 13, 2023
P257	Mary Livesay		January 13, 2023
P258	Kaitlyn Brine		January 13, 2023
P259	Ricky de Laveaga		January 14, 2023
P260	*Comment number intentionally skipped*		
P261	Rahul Gunasekaran		January 14, 2023
P262	Holly Harper		January 14, 2023
P263	Carey Bennett		January 14, 2023
P264	Hayk Makhmuryan		January 14, 2023
P265	Freda Shen		January 15, 2023
P266	Zach		January 14, 2023
P267	The Burgard Family		January 15, 2023
P268	Sara Z Mijares		January 15, 2023
P269	Ezra Muthiah		January 15, 2023
P270	Tom Zhang		January 15, 2023
P271	Tiff H		January 15, 2023
P272	Jacqueline Pabst		January 15, 2023
P273	David Shorter		January 15, 2023
P274	Grace Doyle		January 15, 2023
P275	Bryan Bosque		January 15, 2023
P276	Kim Reyes		January 16, 2023
P277	Nick Scottrussell		January 15, 2023
P278	Liliana Cortez		January 15, 2023
P279	Jaime Zavala		January 15, 2023
P280	Kassandra Zepeda		January 15, 2023
P281	Dennis Rohatyn		January 15, 2023
P282	Suellen Wagner		January 16, 2023
P283	Ric Romero		January 16, 2023
P284	Sara Z. Mijares		January 15, 2023
P285	Brad Bain		January 10, 2023
P286	Xulan		January 3, 2023
P287	Dale Brandenburg		December 26, 2022
P288	Crystal Hernandez		December 13, 2022
P289	Geri Foye		December 12, 2022
P290	Martin Campos		December 13, 2022
P291	Elizabeth Usruitia		December 13, 2022
P292	Danielle Montoya		December 13, 2022
P293	Iris J Ramirez		December 13, 2022
P294	Jade Castillo		December 13, 2022
P295	David Sanchez		December 14, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P296	Enrique Robles		December 14, 2022
P297	Norma Sanchez		December 14, 2022
P298	Maria		December 14, 2022
P299	Guadalupe Rabadau		December 14, 2022
P300	Alejandro		December 14, 2022
P301	Bertha Garcia		December 14, 2022
P302	Noelo Heese		December 14, 2022
P303	Kimberly Drenas		January 8, 2023
P304	Andrew Inema		January 8, 2023
P305	Tina Robles		January 4, 2023
P306	Manuel Cruz		December 15, 2022
P307	Arleen Rivera		December 15, 2022
P308	Jose Sanchez		December 15, 2022
P309	Diane Brown		December 15, 2022
P310	Helen Hurtado		December 15, 2022
P311	Aleena Cruz		December 15, 2022
P312	Jorge Hurtado		December 15, 2022
P313	Rachel Sanchez		December 15, 2022
P314	Monica Cruz		December 15, 2022
P315	Mary Jo Cruz		December 15, 2022
P316	Danny Rivera		December 15, 2022
P317	Yolanda Garza		December 16, 2022
P318	Monique Bracamontes		December 16, 2022
P319	Eric Bracamontes		December 16, 2022
P320	Anel Becerra		December 16, 2022
P321	Arturo Ortiz		December 16, 2022
P322	Eleda de Anda		December 16, 2022
P323	Jennie Rubio		December 16, 2022
P324	Brian Rubio		December 16, 2022
P325	Emma Aguila		December 16, 2022
P326	Jason Seguda		December 16, 2022
P327	Patuel Montanez		December 16, 2022
P328	Vincent Ruilla		December 16, 2022
P329	Martha Garcia		December 15, 2022
P330	Adam Reeves		December 12, 2022
P331	Martha Contreras		December 12, 2022
P332	Rupert Jones		December 12, 2022
P333	Imelda Morales		December 12, 2022
P334	Fatima Lopez		December 13, 2022
P335	Javon Newman		December 13, 2022
P336	Alexander Black		December 13, 2022
P337	Linda Chen		December 13, 2022
P338	Amy Matthews		December 13, 2022
P339	Jesus Villanueva		December 13, 2022
P340	Clarissa Paredez		December 14, 2022
P341	Simon Lopez		December 14, 2022
P342	Spencer Rites		December 14, 2022
P343	Kaylee Smith		December 14, 2022
P344	Robert Slack		December 14, 2022
P345	Juliette Lopez		December 14, 2022
P346	Justine Lee		December 14, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P347	Jason Ramirez		December 15, 2022
P348	Marissa Cortes		December 15, 2022
P349	Lesley Gomez		December 15, 2022
P350	Cindy Maciel		December 15, 2022
P351	Destiny Cruz		December 16, 2022
P352	Amber Cervantes		December 16, 2022
P353	Callie Liley		December 16, 2022
P354	Mariposa Jimenez		December 16, 2022
P355	Victor Balderrama		December 16, 2022
P356	Leticia Reynoso		December 12, 2022
P357	Raymond Noriega		December 12, 2022
P358	Leslie Reynoso		December 12, 2022
P359	Angela Reynoso		December 12, 2022
P360	Celeste Revills		December 12, 2022
P361	Efrain Hernandez		December 12, 2022
P362	Gustavo Hernandez		December 12, 2022
P363	Maria Hernandez		December 12, 2022
P364	Tanya Hernandez		December 12, 2022
P365	Carlos		December 13, 2022
P366	Carlos Aguirre		December 13, 2022
P367	Juan Garcia		December 13, 2022
P368	Yvonne Montoya		December 13, 2022
P369	Anson Li		January 8, 2023
P370	Amy Li		January 8, 2023
P371	Joanne Liu		January 8, 2023
P372	Diana Chen		December 7, 2022
P373	Lyn Chan		December 7, 2022
P374	Marina Chen		January 8, 2023
P375	Lyn Chan		January 8, 2023
P376	Leo Lei		January 8, 2023
P377	Ling		January 8, 2023
P378	Wu Ainne		January 8, 2023
P379	S. Li		January 8, 2023
P380	Angela Chan		January 8, 2023
P381	Kelly		January 8, 2023
P382	Cynthia Lu		January 8, 2023
P383	Kenny Phu		January 8, 2023
P384	Bruce Wong		January 8, 2023
P385	Elaine Cao		January 8, 2023
P386	Xiu Wei Deng		January 8, 2023
P387	Lily		January 8, 2023
P388	C. K. Ko		January 8, 2023
P389	Qingxia Cen		January 8, 2023
P390	Yiyan Situ		January 8, 2023
P391	Su Chan Li		January 8, 2023
P392	Wai Li Kuan		January 8, 2023
P393	Bing Yang Situ		January 8, 2023
P394	Li Shao Xie		January 8, 2023
P395	Xianen Bai		January 8, 2023
P396	Lan Huang		January 8, 2023
P397	Jie Tang Zhou		January 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P398	Guohui Li		January 8, 2023
P399	Rui Fang Feng		December 10, 2022
P400	Daniel Rubio		December 9, 2022
P401	Judy Abarca		December 12, 2022
P402	Teresa Villa		December 12, 2022
P403	Ana C. Sorto		December 12, 2022
P404	Maria Orozco		December 12, 2022
P405	Roberto Vucio		December 12, 2022
P406	Jose Flores		December 12, 2022
P407	Rosaura Ulloa		December 12, 2022
P408	Guillermina Martinez Hernandez		December 13, 2022
P409	Trinidad Zesate		December 13, 2022
P410	Evangelina Zesate		December 13, 2022
P411	Elizabeth Acevedo		December 14, 2022
P412	Jessica Suarez		December 14, 2022
P413	Reina Rodriguez		December 14, 2022
P414	Maria Martinez		December 14, 2022
P415	Mariol Ojeda		December 15, 2022
P416	Maria Areola		December 15, 2022
P417	Alicia Ojeda		December 15, 2022
P418	Manina Huna		December 15, 2022
P419	Carifina Caro		December 15, 2022
P420	Maria Mosqueda		December 15, 2022
P421	Barbara Da		December 15, 2022
P422	Ricardo Garcia		December 15, 2022
P423	Isabel Hernandez		December 15, 2022
P424	Jose Leja		December 7, 2022
P425	Gloria Tucay		December 8, 2022
P426	Victoria Tucay		December 8, 2022
P427	Breeana Ramos		December 8, 2022
P428	Jenny Rivera		December 8, 2022
P429	Jennifer Huerta		December 8, 2022
P430	Sofia Rivera		December 13, 2022
P431	Lisa Villarreal		December 8, 2022
P432	Rojelio Esperanza		December 8, 2022
P433	Gladys Torry		December 7, 2022
P434	Maria Vargas		December 14, 2022
P435	Ramona Gonzalez		December 14, 2022
P436	Yadira Quintero		December 14, 2022
P437	Maria A Coulveros		December 14, 2022
P438	Martina Zuniga		December 14, 2022
P439	Cristian Mara		December 15, 2022
P440	Araceli Rico		December 16, 2022
P441	Jesus Rico		December 16, 2022
P442	Pablo Covarrubias		December 16, 2022
P443	Teresa Covarrubias		December 16, 2022
P444	Viet Tsan		December 10, 2022
P445	Kin Tsan		December 10, 2022
P446	Qun Hua He		December 10, 2022
P447	Maribel Precead		December 10, 2022
P448	Kio Chi Ye		December 10, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P449	Liping Ma		December 10, 2022
P450	Amie Wu		January 10, 2023
P451	Tay Saek You		December 10, 2022
P452	Huang		December 10, 2022
P453	Huang Im Bo		December 10, 2022
P454	Hz Liu Zhang		December 10, 2022
P455	Qing Hing		December 10, 2022
P456	Ruo Shun Hu		December 10, 2022
P457	Ming Hui Liu		December 10, 2022
P458	Zahira Yacoub		January 10, 2023
P459	Susannah Lowber		January 10, 2023
P460	Andy Wong		January 10, 2023
P461	Andrew Beck		January 11, 2023
P462	Adrian Herrera Jr.		January 11, 2023
P463	Jacqueline Lam		January 10, 2023
P464	Jacqueline Lam		January 10, 2023
P465	Hillary Barker		January 10, 2023
P466	Margaret Reardon		January 13, 2023
P467	Robert Brunson		January 13, 2023
P468	Ben Wendel		January 14, 2023
P469	Kathie Tetreault		January 12, 2023
P470	Vicki & Steve Rank		January 13, 2023
P471	Veronica L.		January 12, 2023
P472	Judy Kameon		January 12, 2023
P473	Kya-Marina Le		January 13, 2023
P474	Crystal Cantoran		January 12, 2023
P475	Kanaka Luna		January 12, 2023
P476	John Clement		January 12, 2023
P477	Erica Carlos		January 12, 2023
P478	Louie Mora		January 12, 2023
P479	Roxanna Rendon		January 12, 2023
P480	Vanessa Abrego		January 12, 2023
P481	Nanci Ochoa		January 12, 2023
P482	Jessica Sanchez		January 12, 2023
P483	Camille Suarez, Ph.D.		January 12, 2023
P484	Ester Gonzales		January 12, 2023
P485	Michelle Montenegro		January 12, 2023
P486	Caylin G		January 12, 2023
P487	Gabriela Rosales		January 12, 2023
P488	Ricky de Laveaga		January 12, 2023
P489	Ana Silva		January 12, 2023
P490	Kelle Leonard		January 12, 2023
P491	Petrona Garcia		December 30, 2022
P492	Porsha Pearson		December 30, 2022
P493	Armando Ruiz		December 30, 2022
P494	Laura Hayes		December 30, 2022
P495	Donna Harati		December 30, 2022
P496	Jennifer Rodriguez		December 30, 2022
P497	Liliana Cortez		January 13, 2023
P498	James Martin		January 13, 2023
P499	Jana Rosenblatt		January 13, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P500	Susan Durbin		January 4, 2023
P501	Keiko Utsumi		January 16, 2023
P502	Katherine Chi		January 16, 2023
P503	Sean Mason		January 16, 2023
P504	Sang Wong		January 16, 2023
P505	Michelle Fong		January 16, 2023
P506	Erik Otsea		January 16, 2023
P507	Cameron McManus		January 16, 2023
P508	Nancy De Los Santos Reza		January 16, 2023
P509	Andrew Ko		January 16, 2023
P510	Douglass Abramson		January 16, 2023
P511	LA Parks Alliance	LA Parks Alliance 1855 Industrial Street, #106 Los Angeles, CA 90021	January 16, 2023
P512	640 N. Broadway	640 N Broadway Los Angeles, CA	September 13, 2022
P513	652 N. Broadway	652 N Broadway, Los Angeles, CA	September 13, 2022
P514	Ching Je		September 13, 2022
P515	Kun G Leon		September 13, 2022
P516	Ling Ling		September 13, 2022
P517	Eduardo F. Rosario		September 14, 2022
P518	Geoff Kia Miller		September 14, 2022
P519	Virginia Pinedo		January 16, 2023
P520	Linda Glatstein		January 16, 2023
P521	Julian Engin		January 16, 2023
P522	Andrea Harrow		January 16, 2023
P523	Kathryn Reno		January 16, 2023
P524	Kathleen Rogers		January 16, 2023
P525	Phyllis Ling		January 16, 2023
P526	Gabe Lee		January 16, 2023
P527	Kris Chan		January 16, 2023
P528	Katie Wang		January 16, 2023
P529	Kenny Chan		January 16, 2023
P530	Elba Yanyez		January 16, 2023
P531	Xochitl Manzanilla		January 16, 2023
P532	Tam Po Tien		January 16, 2023
P533	Jose Estrada		January 16, 2023
P534	Amy Ho		January 16, 2023
P535	Melissa Arechiga		January 16, 2023
P536	Victoria Steele		January 16, 2023
P537	Julie Chow		January 16, 2023
P538	Li Wei Huang		January 16, 2023
P539	Ne Huang Hom		January 16, 2023
P540	Alejandra Flores		January 16, 2023
P541	Bob Hanisee		January 16, 2023
P542	Kimberly Turner		January 16, 2023
P543	Brenda Zhang		January 16, 2023
P544	Chrysa Kovach		January 16, 2023
P545	Jane Chow		January 16, 2023
P546	Phyllis Chiu		January 16, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P547	Andrew Yip		January 16, 2023
P548	Renee Tajima		January 16, 2023
P549	Bridget McCarthy		January 16, 2023
P550	Rehyan Rivera		January 16, 2023
P551	Samantha Eddo		January 16, 2023
P552	Jonathan Berman		January 16, 2023
P553	Roger Ly		January 17, 2023
P554	Will Cepeda		January 17, 2023
P555	Buck Wong		January 17, 2023
P556	Renee Pizana		January 17, 2023
P557	Phyllis Muro		January 17, 2023
P558	Adrian Quezada		January 16, 2023
P559	Catherine Sanford		December 8, 2022
P560	Mary Ramos		December 8, 2022
P561	Benson Lai		December 8, 2022
P562	Jennie Limaeya		December 8, 2022
P563	Nieke Gaston		December 7, 2022
P564	Brenda Anohy Hernandez		December 8, 2022
P565	Janis Yue		December 8, 2022
P566	Gordon Lai		December 8, 2022
P567	Marina		December 8, 2022
P568	Jacob Woode		December 7, 2022
P569	Victoria Steele		December 8, 2022
P570	Khinn Ung		December 6, 2022
P571	Oralia Barrios		December 8, 2022
P572	Charlemae Smith		December 8, 2022
P573	Ricardo S Haus		December 8, 2022
P574	David Chueng		December 8, 2022
P575	Tiang Liu		December 8, 2022
P576	Lydia Rebecca Hernandez		December 7, 2022
P577	Teri Vanderberg		December 7, 2022
P578	Sien Ank Mac		December 8, 2022
P579	Jin Tian L		December 8, 2022
P580	Yau Hing Leung		December 8, 2022
P581	Kit Ma Yge		December 8, 2022
P582	Yu Fen Tan		December 8, 2022
P583	Cheng Yee Wong		December 8, 2022
P584	Ellie Tham		December 8, 2022
P585	Lam Ngoc Anh		December 8, 2022
P586	Rosario Hernandez		December 7, 2022
P587	Nancy Ramirez		December 8, 2022
P588	Melissa Reyes		December 8, 2022
P589	Monica Ruiz		December 7, 2022
P590	Casey Maddren		January 17, 2023
P591	Lydia Moreno		January 17, 2023
P592	Elvin Vu		January 17, 2022
P593	Angela Davis		January 17, 2023
P594	Anna Gruben		January 17, 2023
P595	Valerie Veator		January 17, 2023
P596	Michael Steinborn		January 17, 2023
P597	Lydia M Garcia		January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P598	Jacqueline Calvache		January 17, 2023
P599	Isabel Frampton Wade		January 17, 2023
P600	David Michel		January 17, 2023
P601	Lauren Woodrow		January 17, 2023
P602	Naoko Ward		January 17, 2023
P603	Alexandra Abdel-Malek		January 17, 2023
P604	Paul Guijarro		January 17, 2023
P605	Nina Kagan		January 17, 2023
P606	Rachel Sumekh		January 17, 2023
P607	Victoria Steele		January 17, 2023
P608	Yee Ting Huang		January 17, 2023
P609	Brian Smee		January 17, 2023
P610	Nadia Taha		January 17, 2023
P611	Alan Pena		January 17, 2023
P612	Gabriela Davidson-Gomez		January 17, 2023
P613	Ned Teitelbaum		January 17, 2023
P614	Xavier Flores		January 15, 2023
P615	Bella Martinez		January 15, 2023
P616	Vicky Barahona		January 15, 2023
P617	Guadalupe Vasquez		January 15, 2023
P618	Aracely Martinez		January 15, 2023
P619	Arturo Perez		January 15, 2023
P620	Carlos Sanchez		January 14, 2023
P621	Vilma Medric		January 14, 2023
P622	Saul Cruz		January 14, 2023
P623	Norma Ramirez		January 14, 2023
P624	Jesus Ruiz		January 14, 2023
P625	Katherine Rivera		January 13, 2023
P626	Adrian Montoya		January 13, 2023
P627	Luis Olalde		January 13, 2023
P628	Mary Mares		January 13, 2023
P629	Yvonne Montoya		January 13, 2023
P630	Danielle Montoya		January 13, 2023
P631	Elizabeth Urrutia		January 13, 2023
P632	Celeste Savor		January 14, 2023
P633	Norma Robles		January 15, 2023
P634	Tina Robles		January 15, 2023
P635	Geraldine Foye		January 16, 2023
P636	Elida De Anda		January 16, 2023
P637	Emma Aguilar		January 16, 2023
P638	Brian Rubio		January 16, 2023
P639	Jennie Rubio		January 16, 2023
P640	Victor Aguilar		January 16, 2023
P641	Linda Garcia		January 16, 2023
P642	Rogelio Salazar		January 16, 2023
P643	Debra Sosa		January 16, 2023
P644	Lucy Quevedo		January 16, 2023
P645	Mary Urrutia		January 16, 2023
P646	Roxana Duran		January 16, 2023
P647	Luis Reynoso		January 16, 2023
P648	Daisy Reynoso		January 16, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P649	Angela Reynoso		January 16, 2023
P650	Raymond Noriega		January 16, 2023
P651	Leticia Reynoso		January 16, 2023
P652	Leslie Reynoso		January 16, 2023
P653	Silvano Reynoso		January 16, 2023
P654	Zhang		January 17, 2023
P655	Zheng		January 17, 2023
P656	Chris Barry		January 17, 2023
P657	Ken Wong		January 17, 2023
P658	Amanda Cotylo		January 17, 2023
P659	Eddie Barranza		January 17, 2023
P660	Brandon Gibbons		January 17, 2023
P661	Danny Orellana		January 17, 2023
P662	Lisa Duardo		January 17, 2023
P663	Fa Li Xiao		January 17, 2023
P664	Kikei Wong		January 17, 2023
P665	Rodney Scholtes		January 18, 2023
P666	Diane M. L. Tan		January 18, 2023
P667	Samantha Mohammad		January 17, 2023
P668	Brandy Jimenez		January 17, 2023
P669	Allen Natian		January 17, 2023
P670	Sarah Kate		January 17, 2023
P671	Eric Adams		January 18, 2023
P672	Ashley Evangelista-Mendiola		January 18, 2023
P673	Jennifer Martinez		January 17, 2023
P674	Sherin Bennett		January 18, 2023
P675	Jaime Zavaleta		January 17, 2023
P676	Tabatha Yelos		January 18, 2023
P677	Ron Frank		January 18, 2023
P678	Annalee Harr		January 18, 2023
P679	Tabatha Yelos		January 18, 2023
P680	Valerie Albicker		January 18, 2023
P681	Annalee Harr		January 18, 2023
P682	Jasmine Perez		January 17, 2023
P683	Peter Straus		January 18, 2023
P684	Rainey Chevako		January 18, 2023
P685	Sandra Choi		January 18, 2023
P686	Jose Mancera		January 18, 2023
P687	Phyllis Ling		January 17, 2023
P688	Andy Sklawer		December 20, 2022
P689	G. Smith		January 18, 2023
P690-P699	*Comment numbers intentionally skipped*		
P700	Phyllis Ling		January 17, 2023
P701	Robert P. Silverstein	S&R Partners, LLC A Riboli Family Company 737 Lamar Street Los Angeles, CA 90031	January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P702	Phyllis Ling Tany Ling Amy Ho Peter Ho Edwin Li Susan Jung Ron Frank Meika Best Angela Cai Mei Yan Cai Xue Nie Yuen Myra Welsh Albert Ho	Savoy Street Los Angeles, CA	January 17, 2023
P703	Yuval Bar-Zemer		January 16, 2023
P704	Don Luis Camacho		January 17, 2023
P705	Colleen Meyers		January 17, 2023
P706	Tany Ling		January 16, 2023
P707	King Cheung		January 18, 2023
P708	Travis Longcore, Ph.D., Principal Catherine Rich, J.D., M.A., Principal	Land Protection Partners P.O. Box 24020 Los Angeles, CA 90024-0020	January 17, 2023
P709	Phyllis Ling		January 17, 2023
P710	Phyllis Ling		January 18, 2023
P711	Miho Murai		January 17, 2023
P712	Phyllis Ling		January 18, 2023
P713	Maria Gritsch TenHouten & Warren D. TenHouten		January 17, 2023
P714	Christopher Roman		January 18, 2023
P715	Xochitl Manzanilla		October 16, 2022
P716	Tany Ling		October 11, 2022
P717	Alex Ward, Architect		October 20, 2022
P718-P729	*Comment numbers intentionally skipped*		
P730	Charles Robinson		January 16, 2023
P731	Manohla Dargis		January 19, 2023
P732	Justin Dickerson		January 18, 2023
P733	Sara Feldman		January 18, 2023
P734	Nick Marcone, Secretary	Echo Park Neighborhood Council 1226 N. Alvarado Street Los Angeles, CA 90026	January 30, 2023
P735	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 17, 2023
P736	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 31, 2023
P737	Karina Macias, Senior Deputy, Transportation and Infrastructure	Los Angeles County Supervisor Hilda L. Solis, First District	February 1, 2023
P738	Zab Steenwyk		February 1, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P739	Robert Cole		February 7, 2023
P740	Mara Fisher		January 31, 2023
P741	Sara Clendening, President	Lincoln Heights Neighborhood Council	February 6, 2023
P742	Dennis Rohatyn		February 6, 2023
P743	Douglas P. Carstens	The California Endowment (TCE)	February 7, 2023
P744	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	February 8, 2023
P745	Sunjana Supekar	The California Endowment (TCE)	February 9, 2023
P746	Heather Donnelly		February 9, 2023
P747	Iran Carranza		February 9, 2023
P748	Carey McDonald	Elysian Valley Riverside Neighborhood Council P.O. Box 39522 Los Angeles, CA 90039-0522	August 18, 2023
P749	Amanda Kazen		February 13, 2023
P750	Raul Macias Gloria Medina Veronica Padilla-Campos Maria Patino Gutierrez Betty AvilaNancy Halpern Ibrahim	Stop the Gondola	March 6, 2023
P751	Tony Torres		January 18, 2023
Public Hearing (PH)			
PH1	Xiagtian Xu		December 10, 2022
PH2	Andy Hall		December 10, 2022
PH3	Julie Rico		December 10, 2022
PH4	Miguel Melgoza		December 10, 2022
PH5	Jennie Linheya		December 10, 2022
PH6	Patrick Chen		December 10, 2022
PH7	Rebecca Ocegueda		December 10, 2022
PH8	Esperanza Ramirez		December 10, 2022
PH9	Robert Macias, President	Anahuak Youth Soccer League	December 10, 2022
PH10	Gloria Andrade		December 10, 2022
PH11	Renee Young		December 10, 2022
PH12	Juniper Wong		December 10, 2022
PH13	Bill Chin		December 10, 2022
PH14	Andrew Vought		December 10, 2022
PH15	Marc Futernick		December 10, 2022
PH16	Teri Vanderberg		December 10, 2022
PH17	Douglas Carstens	The California Endowment (TCE)	December 10, 2022
PH18	Kenneth Chan		December 10, 2022
PH19	Jonathan Berman		December 10, 2022
PH20	Baldomero Capiz, President	National Union of Ex Berceros	December 10, 2022
PH21	Maria Elena Padino		December 10, 2022
PH22	Disraely Butler		December 10, 2022
PH23	Tany Ling		December 10, 2022
PH24	Phyllis Ling		December 10, 2022
PH25	Eric Smith		December 10, 2022
PH26	Maria Salnejon		December 10, 2022

Letter	Name (title)	Organization/Address	Date of Letter
PH27	Renee Young, President	National Association of Women Business Owners (NAWBO-LA)	December 10, 2022
PH28	Guan Bao		December 10, 2022
PH29	Andrea Lacaza		December 10, 2022
PH30	Maribel		December 10, 2022
PH31	Fernando Quesada		December 10, 2022
PH32	Simon Fraga		December 10, 2022
PH33	Abram Illescas		December 10, 2022
PH34	Amparo Cabrera		December 10, 2022
PH35	Socorro Lugo		December 10, 2022
PH36	Fang Li Chang		December 10, 2022
PH37	Juniper Wong		December 10, 2022
PH38	Karina Ramos		December 10, 2022
PH39	Gustavo Gonzales		December 10, 2022
PH40	Maria L.		December 10, 2022
PH41	Lucrecia Vargas D.		December 10, 2022
PH42	Claudia Vasquez		December 10, 2022
PH43	Tany Ling		December 10, 2022
PH44	Luis Ramos		December 10, 2022
PH45	Maria Gutierrez		December 10, 2022
PH46	Drew Miller		December 10, 2022
PH47	Disraeli Butler		December 10, 2022
PH48	Dong Lee		December 10, 2022
PH49	Moon Smeyev		December 10, 2022
PH50	Jose Roberto Garela		December 10, 2022
PH51	Juana Noriega		December 10, 2022
PH52	Wences Sanchez		December 10, 2022
PH53	Irine Andalon R.		December 10, 2022
PH54	Jeremiah Arriaga		December 10, 2022
PH55	Jonathan Berman	Cal State US	December 10, 2022
PH56	Bryn Lindblad		December 10, 2022
PH57	Alma R. Melgoza		December 10, 2022
PH58	Lynn Chen	Chinese American Construction Professionals	December 10, 2022
PH59	Patrick Paul Gallego II		December 10, 2022
PH60	Lynn Chen	Earl Security, Inc.	December 10, 2022
PH61	Esperanza Andrade		December 10, 2022
PH62	Sophat Phea		December 10, 2022
PH63	Teri Vanderberg		December 10, 2022
PH64	Rebeca Ocegueda		December 10, 2022
PH65	Julie Rico		December 10, 2022
PH66	Jose Estrada		December 10, 2022
PH67	Maria Lemus		December 10, 2022
PH68	Monica Vazquez		December 10, 2022
PH69	Joshua Neal		December 10, 2022
PH70	Kevin Ho		December 10, 2022
PH71	Maria Avila		December 10, 2022
PH72	Andy		December 10, 2022
PH73	Samuel Maury-Holmes		December 10, 2022
PH74	Mark Edwards		December 10, 2022
PH75	Julie Chow		January 12, 2023
PH76	Hugo Garcia	Save Elephant Hill	January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH77	L. Spangler		January 12, 2023
PH78	Zhao Can Guan		January 12, 2023
PH79	Matt Hebermehl		January 12, 2023
PH80	L. Meza		January 12, 2023
PH81	Gigi Droesch		January 12, 2023
PH82	Philip Murphy	Friend of Elysian Park	January 12, 2023
PH83	Mark McRae		January 12, 2023
PH84	Margaret Fong		January 14, 2023
PH85	Olali Perez		January 12, 2023
PH86	Sakae Koyama	Friends of Elysian Park	January 12, 2023
PH87	Norvan Gorgi		January 12, 2023
PH88	Guilmar Perdorno	The Wall Las Memorial	January 12, 2023
PH89	Elizabeth		January 12, 2023
PH90	Robert Reyes Villagomez	Housing California	January 12, 2023
PH91	Aaron Thomas		January 12, 2023
PH92	Darlene Escobedo		January 12, 2023
PH93	Katty Rodriguez	Sierra Club LA Chapter	January 12, 2023
PH94	Helen Villagomez		January 12, 2023
PH95	Elva Yanez	Save Elephant Hill	January 12, 2023
PH96	Eugene Pesileon	LATU	January 12, 2023
PH97	Eleanor Bray		January 12, 2023
PH98	Luke Braidizzle		January 12, 2023
PH99	Huang Li Wei		January 12, 2023
PH100	Nazaro Arreola		January 12, 2023
PH101	No Name Given		January 12, 2023
PH102	Chance Menendez		January 12, 2023
PH103	Zhu Yue Li		January 12, 2023
PH104	Wei Lian Tan		January 12, 2023
PH105	Bin Xie		January 12, 2023
PH106	Wu Coi Xia		January 12, 2023
PH107	Qi Guang Chen		January 12, 2023
PH108	Wei An Jhu Yen		January 12, 2023
PH109	Caritina Caro		January 12, 2023
PH110	Grace Bryant		January 12, 2023
PH111	Mary Areola		January 12, 2023
PH112	Luis Herrera		January 12, 2023
PH113	Yi H		January 12, 2023
PH114	Amy Tang		January 12, 2023
PH115	Chiu		January 12, 2023
PH116	H Wu		January 12, 2023
PH117	Liam Ncc		January 12, 2023
PH118	Jesus Leija	The Wall las Memorias	January 11, 2023
PH119	Zhou Jies		January 12, 2023
PH120	Ne Hueng Ho M		January 12, 2023
PH121	Kai M Fong		January 12, 2023
PH122	Sharon		January 12, 2023
PH123	Yun Hoc Thai		January 12, 2023
PH124	Tan		January 12, 2023
PH125	Li Yi Ye		January 12, 2023
PH126	Xiao		January 12, 2023
PH127	Yue Xian Fang	Cathay Manor Apartments	January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH128	Rhio Shen Hu		January 12, 2023
PH129	Wei Han Tan		January 12, 2023
PH130	Illegible Name		January 12, 2023
PH131	Jennifer Ly		January 12, 2023
PH132	Illegible Name		January 12, 2023
PH133	Shu Ma		January 12, 2023
PH134	Lucy Petrow		January 12, 2023
PH135	Po Wang Knan		January 12, 2023
PH136	Chi Jing Lee		January 12, 2023
PH137	Yang Luong		January 12, 2023
PH138	Illegible Name		January 12, 2023
PH139	Win Am Tim Hui		January 12, 2023
PH140	Hui Qiang Li		January 12, 2023
PH141	Albert Ho		January 12, 2023
PH142	Allen Leon		January 12, 2023
PH143	Cerianne Robertson		January 12, 2023
PH144	Fatima Carrera		January 12, 2023
PH145	Xochitl Manzanilla		January 12, 2023
PH146	Vivi		January 12, 2023
PH147	Li Ping Ma		January 12, 2023
PH148	Yu Hue Chi		December 9, 2022
PH149	Ciro Avila		January 12, 2023
PH150	Cui Lian Wu		January 12, 2023
PH151	Wu Cui Xia		January 12, 2023
PH152	Jasmine Wang		January 12, 2023
PH153	Edwin Li		January 12, 2023
PH154	Luke MacDonald		January 12, 2023
PH155	Casa Wilson		January 12, 2023
PH156	Rachel Day	Rampart Village Neighborhood Council	January 12, 2023
PH157	Maria Elena Patino		January 12, 2023
PH158	Berta Avila		January 12, 2023
PH159	Katie Miles		January 13, 2023
PH160	Rebecca		January 12, 2023
PH161	Gabe Ross		January 12, 2023
PH162	Kevin Giron		January 12, 2023
PH163	Kevin Lau		January 12, 2023
PH164	Jian Ai Li		January 12, 2023
PH165	Jess Gudie		January 12, 2023
PH166	Lai Chiung Mi		January 12, 2023
PH167	Kun Goc Leon		January 12, 2023
PH168	No Name Given		January 12, 2023
PH169	No Name Given		January 12, 2023
PH170	Santiago Vega		January 12, 2023
PH171	Kevin Lau		January 12, 2023
PH172	Kathleen Johnson, Executive Director	Los Angeles River State Park Partners	January 12, 2023
PH173	Olivia Viera, Founder	Indigenous Wellness Collective	January 12, 2023
PH174	Melissa Arechiga		January 12, 2023
PH175	Xiangtian Xu		January 12, 2023
PH176	Chris Gibson		January 12, 2023
PH177	Gabriel Owens-Flores		January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH178	Xulan Chen		January 12, 2023
PH179	Edwin Li		January 12, 2023
PH180	Chris Hannan	Los Angeles/Orange Counties Building and Construction Trades Council 1626 Beverly Boulevard Los Angeles, CA 90026	January 12, 2023
PH181	Howard Amster		January 12, 2023
PH182	Kevin James	International Union of Operating Engineers, Local # 12	January 12, 2023
PH183	Chris Wilson	Los Angeles County Business Federation (BizFed)	January 12, 2023
PH184	Andrew Vought		January 12, 2023
PH185	Eleanor Bray		January 12, 2023
PH186	Kenneth Chan		January 12, 2023
PH187	Richard Zaldivar		January 12, 2023
PH188	Lee Suan		January 12, 2023
PH189	Anne Freiermuth		January 12, 2023
PH190	William Wong		January 12, 2023
PH191	Judy Chow		January 12, 2023
PH192	Elva Yanez		January 12, 2023
PH193	Jennifer Rodriguez		January 12, 2023
PH194	Miriam Bar-Zemer		January 12, 2023
PH195	Ron Frank		January 12, 2023
PH196	Xochitl Manzanilla		January 12, 2023
PH197	Miho Murai		January 12, 2023
PH198	Marta Woodhull		February 8, 2023
PH199	Chris Hannan	Los Angeles-Orange Counties Building and Construction Trades Council 1626 Beverly Boulevard Los Angeles, CA 90026	February 8, 2023
PH200	Peter Kwan		February 8, 2023
PH201	Gay Yuen		February 8, 2023
PH202	Kris Chan		February 8, 2023
PH203	Eric Adams		February 8, 2023
PH204	Jon Christensen		February 8, 2023
PH205	Maria Flores		February 8, 2023
PH206	Pat Suzak		February 8, 2023
PH207	Sarah Harris		February 8, 2023
PH208	Mark McCrea		February 8, 2023
PH209	Ted Green		February 8, 2023
PH210	Omar Galindo		February 8, 2023
PH211	Gus Torres		February 8, 2023
PH212	Marianna Gatto, Director	Italian American Museum of Los Angeles	February 8, 2023
PH213	Erica Garcia		February 8, 2023
PH214	Alex Alvarez		February 8, 2023
PH215	Ron Frank		February 8, 2023
PH216	Casa Wilson		February 8, 2023
PH217	Katherine Norian	Chinatown Station Owner, LLC	February 8, 2023
PH218	Sunjana Supekar	The California Endowment (TCE)	February 8, 2023
PH219	Jason Fujimoto		February 8, 2023
PH220	Phyllis Ling		February 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH221	Speaker 1		February 8, 2023
PH222	Tan		February 8, 2023
PH223	Speaker 3		February 8, 2023
PH224	Ling Lee		February 8, 2023
PH225	Speaker 4		February 8, 2023
PH226	Sophat Phea		February 8, 2023
PH227	Ernest Lee		February 8, 2023
PH228	Tany Ling		February 8, 2023
PH229	Sakae Koyama		February 8, 2023
PH230	Andy		February 8, 2023
PH231	Rick Garcia		February 8, 2023
PH232	Juniper Wong		February 8, 2023
PH233	Patrick Chen		February 8, 2023
PH234	Amy Ho		February 8, 2023
PH235	Larry Jung		February 8, 2023
PH236	King Cheung		February 8, 2023
PH237	Dana Martinez		February 8, 2023
PH238	Charly Ligety		February 8, 2023
PH239	Joe Rincon		February 8, 2023
PH240	Melanie Bellomo		February 8, 2023
PH241	Alejandro Campillo		February 8, 2023
PH242	Julie Rico		February 8, 2023
PH243	Iran Carranza		February 8, 2023
PH244	Albert Holm		February 8, 2023
PH245	Liliana Cortez		February 8, 2023
PH246	Jennifer Wong		February 8, 2023
PH247	Fernanda Sanchez		February 8, 2023
PH248	Cheng Yang & Yu Hang Tang		February 8, 2023
PH249	Edwin Li		February 8, 2023
PH250	Luis Guerrero		February 8, 2023
PH251	Miguel Castellon		February 8, 2023
PH252	Richard Rojas		February 8, 2023
PH253	Dahma Cho		February 8, 2023
PH254	Billy Yates		February 8, 2023
PH255	Camarillo		February 8, 2023
PH256	Monica		February 8, 2023
PH257	Bill		February 8, 2023
PH258	Angelica		February 8, 2023
PH259	Annie Shaw		February 8, 2023
PH260	Maria Cervantes		February 8, 2023
PH261	Edgar		February 8, 2023
PH262	Lynn Dwyer		February 8, 2023
PH263	Valerie Morishige		February 8, 2023
PH264	Paul Des Marais		February 8, 2023
PH265	Vincent Montago		February 8, 2023
PH266	Melissa Arechiga		February 8, 2023
PH267	Rafael		February 8, 2023
PH268	Ray		February 8, 2023
PH269	Carlos Gomez		February 8, 2023
PH270	Tom Savio		February 8, 2023
PH271	Lisa Duardo		February 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH272	Michael Calareza		February 8, 2023
PH273	Brenda Miramontes		February 8, 2023
PH274	Maria Manzanilla		February 8, 2023
PH275	Jennifer Martinez		February 8, 2023
PH276	Mary		February 8, 2023
PH277	Marlo Cervantes		February 8, 2023
PH278	Ali Rubinfeld		February 8, 2023
PH279	Erik Van Breene	Los Angeles Conservancy	February 8, 2023
PH280	Katherine Christman		December 13, 2022
PH281	Chris Wilson		December 13, 2022
PH282	Mary		December 13, 2022
PH283	Kathleen Johnson		December 13, 2022
PH284	Bill Chen		December 13, 2022
PH285	Elias Garcia		December 13, 2022
PH286	Phyllis Ling		December 13, 2022
PH287	Tabitha		December 13, 2022
PH288	Speaker 18		December 13, 2022
PH289	Speaker 19		December 13, 2022
PH290	Ernest Li		December 13, 2022
PH291	Speaker 21		December 13, 2022
PH292	Wong		December 13, 2022
PH293	King Cheung		December 13, 2022
PH294	Luke MacDonald		December 13, 2022
PH295	Michael		December 13, 2022
PH296	Douglas Carstens	The California Endowment (TCE)	December 13, 2022
PH297	Speaker 27		December 13, 2022
PH298	Jim Starr		December 13, 2022
PH299	Melissa		December 13, 2022
PH300	Michael Chong		December 13, 2022
PH301	Edwin Lee		December 13, 2022
PH302	Alan Weeks		December 13, 2022
PH303	Darryl Saucedo		December 13, 2022
PH304	Speaker 35		December 13, 2022
PH305	Carlos Gomez		December 13, 2022
PH306	Lester		December 13, 2022
PH307	Speakers 40-41		December 13, 2022
PH308	Kayla		December 13, 2022
PH309	Monica Vasquez		December 13, 2022
PH310	Ms. Wong		December 13, 2022
PH311	Jason		December 13, 2022
PH312	Sharon Coleman		December 13, 2022
PH313	Sarah Vande Camp		December 13, 2022
PH314	Bill		December 13, 2022
PH315	Diane Weiss		December 13, 2022
PH316	Drew Miller		December 13, 2022
PH317	Dawn Huang		December 13, 2022
PH318	Carlos		December 13, 2022
PH319	Eric		December 13, 2022
PH320	Monica Cruz		December 13, 2022
PH321	Michael Berg		December 13, 2022
PH322	Alex Alvarez		December 13, 2022

Letter	Name (title)	Organization/Address	Date of Letter
PH323	Speaker 58		December 13, 2022
PH324	Crystal		December 13, 2022
PH325	Ron		December 13, 2022
PH326	Katie		December 13, 2022
PH327	Yeg Lin Wong		January 17, 2023
PH328	Wu Shuo Li		January 17, 2023
PH329	Zhey Wen Zhen		January 15, 2023
PH330	Lorenz G Biyun		January 15, 2023
PH331	Aicui Zhou		January 17, 2023
PH332	Zhou		January 17, 2023
PH333	Wei Mei		January 15, 2023
PH334	Mei Kven Li		January 15, 2023
PH335	Lean Ah Tan		January 15, 2023
PH336	Sean Lee		January 15, 2023
PH337	Lee Suan		January 15, 2023
PH338	Josefina Hanas		January 9, 2023
PH339	Magdalena Luna		January 9, 2023
PH340	Isabel Rios		January 8, 2023
PH341	Maria Ortega		January 8, 2023
PH342	Enrique Luna		January 9, 2023
PH343	Bertha Magona		January 7, 2023
PH344	Arcaceli Rico		January 9, 2023
PH345	Alicia Garcia		January 7, 2023
PH346	Jesus Rico		January 9, 2023
PH347	Andrea Hernandez		January 7, 2023
PH348	Bertha		January 7, 2023
PH349	Rosa Juarez		January 16, 2023
PH350	Maribel Aceves		January 16, 2023
PH351	Karen Alfaro		January 16, 2023
PH352	Saul Duran		January 16, 2023
PH353	Angel Ruiz		January 16, 2023
PH354	Stephanie		January 16, 2023
PH355	Alexis Cuevas		January 16, 2023
PH356	Manuel Antonio Vasquez		January 17, 2023
PH357	Alfredo Gutierrez		January 16, 2023
PH358	Cynthia Gutierrez		January 16, 2023
PH359	Alicia Jimenez		January 15, 2023
PH360	Aquiles Castino		January 15, 2023
PH361	Jose Luis Ramos		January 15, 2023
PH362	Giovanni Duran		January 15, 2023
PH363	Edith Salmeron		January 15, 2023
PH364	Elena Garcia		January 15, 2023

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6.2 TOPICAL RESPONSES

TOPICAL RESPONSE A
SB 44

Comments on the Draft EIR address the proposed Project's consistency with Senate Bill ("SB") 44. Comments regarding SB 44 do not raise substantive issues on the content of the Draft EIR and therefore no response is required pursuant to CEQA. Nevertheless, this topical response provides an overview of SB 44's standards and how the proposed Project is consistent with them for informational purposes.

As discussed in Section 1.4.3, Senate Bill 44, of Section 1.0, Introduction, of the Draft EIR, SB 44 added Section 21168.6.9 to the Public Resources Code to provide for streamlined judicial review for "environmental leadership transit projects." To qualify for SB 44's streamlined judicial review process, a project must be an "environmental leadership transit project," defined as a "fixed guideway" that (i) operates at zero emissions; (ii) reduces GHG emissions in the project's corridor "as defined in the applicable environmental document over the useful life of the project, without using offsets"; (iii) reduces 30 million vehicle miles traveled in the project's corridor "as defined in the applicable environmental document over the useful life of the project"; (iv) is consistent with the applicable sustainable communities strategy and regional transportation plan; and (v) incorporates sustainable infrastructure practices.[1]

The proposed Project meets each of these standards.

Fixed Guideway

SB 44 states that "fixed guideway" "has the same meaning as defined in Section 5302 of Title 49 of the United States Code."[2] Section 5302 of Title 49 of the United States Code includes definitions related to the Federal Transit Administration's ("FTA") public transportation programs and policies, including Fixed Guideway Capital Investment Grants ("Section 5309 Grant Program"). Section 5302 defines "fixed guideway" as follows.

The term "fixed guideway" means a public transportation facility—

(A) using and occupying a separate right-of-way for the exclusive use of public transportation;

(B) using rail;

(C) using a fixed catenary system;

(D) for a passenger ferry system; or

(E) for a bus rapid transit system.[3]

[1] California Public Resources Code. 2022. Section 21168.6.9.
[2] California Public Resources Code. 2022. Section 21168.6.9(a)(2).
[3] United States Code. Title 49, Section 5302(7).

Therefore, in order to qualify as a "fixed guideway," a project must be "public transportation" meeting the statute's prescribed categories. An expanded discussion of this definition, along with the proposed Project's consistency with this definition, is provided below.

The Proposed Project Would Operate Daily for Public Service and Is Therefore Public Transportation

As a threshold matter, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times.

Under Federal law, "[t]he term 'public transportation'— (A) means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and (B) does not include— (i) intercity passenger rail transportation provided by the entity described in chapter 243 (or a successor to such entity); (ii) intercity bus service; (iii) charter bus service; (iv) school bus service; (v) sightseeing service; (vi) courtesy shuttle service for patrons of one or more specific establishments; or (vii) intra-terminal or intra-facility shuttle services."[4]

The proposed Project meets this definition because it will be operated at regular, scheduled operating hours and will be open to the general public. As discussed in Section 2.01, Project Overview, of Section 2.0, Project Description, of the Draft EIR:

> [The] proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at [Los Angeles Union Station (LAUS)]. . . . The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Accordingly, the proposed Project would be open to the general public. While there may be some limited circumstances where priority boarding will be given to Dodger ticketholders, the proposed Project will never close to the general public when operating. Further, while the proposed Project may "vary the number of cabins in service and speed throughout the day, based on demand," just as Metro trains and buses do, the proposed Project will operate under a pre-determined, regular operating hour schedule. Therefore, the proposed Project meets the relevant definition of public transportation for whether it is a "fixed guideway" under Federal law.

In addition, as discussed on page 2-8 in Subsection 2.3.7, Purpose and Need, of the Draft EIR,

> [T]he proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would include a mobility hub at Chinatown/State Park Station. . . [and a] mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities.

[4] United States Code. Title 49, Section 5302(15).

The Proposed Project, as an Aerial Tramway, Is a Fixed Guideway, Consistent with FTA Precedent

The FTA deems "aerial tramways" to be a "fixed guideway." The proposed Project is an aerial tramway. Therefore, the proposed Project is a "fixed guideway" under SB 44.

In 2004, the FTA described the Section 5309 Grant Program in the federal register and explicitly recognized that aerial tramways are included within the definition of "fixed guideway":

> A "fixed guideway" refers to any transit service that uses exclusive or controlled rights-of-way or rails, entirely or in part. ***The term includes*** heavy rail, commuter rail, light rail, monorail, trolleybus, ***aerial tramway***, inclined plane, cable car, automated guideway transit, ferryboats, that portion of motor bus service operated on exclusive or controlled rights-of-way, and high-occupancy-vehicle (HOV) lanes.[5]

Thus, the FTA considers aerial tramways fixed guideways for the purposes of the definition in Section 5302. Based on the plain language of Section 5302, aerial tramways fall under subpart (A), "using and occupying a separate right-of-way for the exclusive use of public transportation" and subpart (C), "using a fixed catenary system."

The Proposed Project Would Be Zero Emissions

As described on page 1-4, in Section 1.0, Introduction, of the Draft EIR, under SB 44, the environmental leadership transit project must operate at zero emissions. As discussed on page 1-5, in Section 1.0, Introduction, of the Draft EIR, the proposed Project will operate at zero emissions. The proposed Project guideway is powered by electricity. The electrical power for the proposed Project would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Battery storage backup will be installed at each station, tower, and the non-passenger junction. Enrollment in LADWP's Green Power Program and battery back up will reduce GHG emissions and improve air quality. Accordingly, the primary electricity usage associated with the proposed Project guideway would come from renewable resources and result in zero GHG and criteria pollutant emissions, satisfying the requirement to operate at zero emissions. Refer to Section 3.03, Air Quality, and Section 3.08, Greenhouse Gas Emissions, of the Draft EIR which provide additional details on the operational characteristics of the proposed Project that result in zero GHG and criteria pollutant emissions.

The Proposed Project Would Reduce GHG Emissions in the Project's Corridor

As discussed on page 1-5, in Section 1.0, Introduction, of the Draft EIR, under SB 44, projects under two miles in length must reduce emissions by no less than 50,000 metric tons directly in the corridor of the project defined in the applicable environmental document. The proposed Project, which is less than two miles in length, would reduce emissions by no less than 50,000 metric tons of GHG emissions directly in the Project's corridor as defined within the EIR over the useful life of the proposed Project, without using offsets. The proposed Project would reduce GHG emissions by 3,493 metric tons of carbon dioxide

[5] FTA Fiscal Year 2005 Apportionments, Allocations and Program Information, 69 FR 78209-78210 https://www.govinfo.gov/content/pkg/FR-2004-12-29/pdf/04-28408.pdf (accessed September 20, 2023).

equivalent per year (MT CO_2e/year) in the buildout year of 2026 and by 6,277 MT CO_2e/year in the horizon year of 2042. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime emissions of the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 50,000 metric tons of GHGs at 166,653 MT CO_2e. Therefore, the proposed Project, as a 1.2-mile fixed guideway system, would reduce 50,000 metric tons of GHG emissions in the Project's corridor, satisfying the requirements of Public Resources Code section 21168.6.9(a)(1)(B). Refer to Section 3.08, Greenhouse Gas Emissions, of the Draft EIR, which provides additional details on the proposed Project's expected GHG emissions reductions.

The Proposed Project Would Reduce VMT by at Least 30 Million

As discussed on pages 1-5 and 1-6, in Section 1.0, Introduction of the Draft EIR, the proposed Project would reduce "no less than 30,000,000 vehicle miles traveled in the corridor of the project defined in the applicable environmental document over the useful life of the project," satisfying SB 44's requirement to do so. As detailed in Table 3.17-6 in Section 3.17, Transportation, of the Draft EIR, the proposed Project is forecast to reduce annual VMT by 2,434,000 in the proposed Project's first operational year in 2026, increasing as ridership increases to an annual VMT reduction of 5,067,000 in 2042.

Using the 2026 reduction figures alone, the proposed Project would therefore achieve a minimum of 30,000,000 VMT reduced in approximately 12.3 years. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime VMT reduction of the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under Public Resources Code section 21168.6.9(1)(C).

The Proposed Project Is Consistent with the RTP/SCS

As discussed on pages 1-6 through 1-8, in Section 1.0, Introduction, of the Draft EIR, the proposed Project satisfies SB 44's requirement to be consistent with the applicable sustainable communities strategy and alternative planning strategy and the applicable regional transportation plan under Public Resources Code sections 21168.6.9(a)(1)(D) and 21168.6.9(a)(1)(E), respectively. In September 2020, the Southern California Association of Governments approved and fully adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), called Connect SoCal, the applicable sustainable communities strategy and regional transportation plan for the proposed Project. The plan outlines ten main goals, each of which the proposed Project is consistent with. Refer to the table on pages 1-6 to 1-7 in Section 1.0 Introduction, of the Draft EIR for a more detailed discussion of the proposed Project's consistency with these goals.

The proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities. The proposed Project would reduce GHG emissions by reducing VMT. Accordingly, the proposed Project would be consistent with goals in Connect SoCal and is, thus, consistent with the applicable sustainable communities strategy and regional transportation plan, satisfying Public Resources Code sections 21168.6.9(a)(1)(D) and 21168.6.9(a)(1)(E).

The Proposed Project Incorporates Sustainable Infrastructure Practices

As discussed on pages 1-8 and 1-9, in Section 1.0, Introduction, of the Draft EIR, SB 44 requires the Project Sponsor to demonstrate "how it has incorporated sustainable infrastructure practices to achieve sustainability, resiliency, and climate change mitigation and adaptation goals in the project, including principles, frameworks, or guidelines as recommended by one or more of the following: (i) [t]he sustainability, resiliency, and climate change policies and standards of the American Society of Civil Engineers[;] (ii) [t]he Envision Rating System of the Institute for Sustainable Infrastructure; [or] (iii) [t]he Leadership in Energy and Environment Design (LEED) rating system of the United States Green Building Council" (USGBC).

The proposed Project is an innovative and sustainable transit system that provides a sustainable, high-capacity, zero emission aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. Aerial rapid transit technology is quiet, minimizing noise and vibration, and the proposed Project would reduce VMT and congestion, leading to reduced GHG emissions and improved air quality.

The proposed Project has been reviewed against the policies and standards of the Envision Rating System of the Institute for Sustainable Infrastructure, as well as USGBC's LEED for Building Design and Construction and has incorporated sustainability features based on these rating systems. Refer to pages 2-48 through 2-50 in Section 2.0, Project Description of the Draft EIR, for a detailed discussion of the proposed Project's sustainability features.

Accordingly, pursuant to Public Resources Code section 21168.6.9(a)(1)(F), the proposed Project would incorporate sustainable infrastructure practices to achieve sustainability, resiliency, and climate change mitigation and adaptation goals in the Project, including USGBC's LEED rating system and the Envision Rating System of the Institute for Sustainable Infrastructure's policies and standards.

Metro Held All Required Public Meetings for SB 44

SB 44 requires that during the public review period for the Draft EIR, the lead agency hold one "informational workshop to inform the public of the key analyses and conclusions [of the Draft EIR]" within 10 calendar days after the release of the Draft EIR (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3)), and one "public hearing to receive testimony on the [Draft EIR]" within 10 calendar days before the close of the public review period. (*Id*., § 21168.6.9(e)(1)(C)(ii)(4).)

The Draft EIR was released on October 17, 2022, for a 60-day public review period ending on December 16, 2022. On November 15, 2022, Metro, as the lead agency, extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023. During this 90-day public review period, Metro held two informational workshops and three public hearings. In light of disruptions at the third public hearing, Metro provided a fourth public hearing by way fo a virtual public hearing held after the close of the public review period to provide an additional opportunity for attendees to provide verbal testimony. Verbal comments made at this fourth public hearing were deemed timely submitted for purposes of the Draft EIR public review period.

Metro Held Two Informational Workshops – SB 44 Requires Only One

While SB 44 only requires one informational workshop within 10 calendar days after the release of the Draft EIR, Metro held two informational workshops – one virtual, and one in-person – to "inform the public of the key analyses and conclusions of the [Draft EIR]," within 10 calendar days of the release of the Draft EIR. (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3).)

The Draft EIR was released on October 17, 2022. The first informational workshop was a virtual informational workshop held on Saturday, October 22, 2022, from 10 am – 12 pm, via Zoom webinar. The second informational workshop was an in-person informational meeting held on Tuesday, October 25, 2022, from 5 pm – 7 pm at Los Angeles Union Station's Ticket Concourse. Both informational workshops were, therefore, held "within 10 calendar days after the release of the Draft EIR," satisfying and exceeding the requirement of SB 44.

SB 44 requires that the informational workshop "inform the public of the key analyses and conclusions of [the Draft EIR]." (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3).)

The format of the virtual informational workshop was a presentation of the proposed Project, including the Draft EIR's key analyses and conclusions, followed by a question and answer session during which attendees could ask questions using the Zoom Q&A feature. Interpretation in Spanish, Mandarin, and Cantonese was provided in separate channels and slides were made available to attendees in English, Spanish, Chinese (Simplified) and Chinese (Traditional) on the lead agency's website. Written interpretation of questions typed into Zoom's chat and Q&A features was also available for any questions received in Chinese (Simplified), Chinese (Traditional), and Spanish. Closed-captioning was also provided for accessibility pursuant to the requirements of the Americans with Disabilities Act (ADA). The virtual informational workshop was staffed by Metro, the Draft EIR preparer's staff, subject matter experts, and the proposed Project team, who answered attendee questions on the Draft EIR key analyses and conclusions.

The format of the in-person informational workshop was an open house, consistent with Metro's standard practice, during which attendees could be informed of the proposed Project's key analyses and conclusions and could learn how to comment on the Draft EIR. Spanish, Mandarin, and Cantonese Interpreters were provided to assist attendees in need of interpretation. Printed materials providing additional information about the Draft EIR's key analyses and conclusions were provided in English, Spanish, Chinese (Simplified) and Chinese (Traditional). Twelve stations with large, printed boards providing additional information about the subject matter of each station, were set up throughout the Los Angeles Union Station Ticket Concourse, with ten stations focused on specific subject matter areas of the Draft EIR and their key analyses and conclusions, one station dedicated to information on aerial rapid transit technology, and one station with a video presentation of the proposed Project. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station also included printed materials, including the presentation of the Draft EIR's key analyses and conclusions from the virtual informational workshop, that attendees could review and/or take with them. A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review during the informational workshop. The meeting was staffed by Metro and Draft EIR preparer staff,

subject matter experts, and the proposed Project team, who answered questions from attendees on the Draft EIR key analyses and conclusions.

Metro Held Four Public Hearings – SB 44 Requires Only One

While SB 44 only requires one public hearing to be held within 10 calendar days before the close of the public comment period, Metro held four public hearings to receive testimony on the Draft EIR. (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(4).) Metro held three public hearings during the Draft EIR public review period – two in-person and one virtual, and one virtual public hearing immediately following the close of the public review period. The first two public hearings were held within 10 days of the original close of the public review period, which would have been December 16, 2022. After Metro, on November 15, 2022, extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023, a third public hearing was added for January 12, 2023, within 10 calendar days of the new close of the public review period. One public hearing was therefore held "within 10 calendar days before the close of the public review period," satisfying the requirement of SB 44. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

The first public hearing was an in-person public hearing held on December 10, 2022, from 10:00 am to 12:00 pm, at Los Angeles Union Station's Ticket Concourse. The second public hearing was a virtual public hearing held on December 13, 2022, from 5:00 pm to 7:00 pm, via Zoom webinar. The third public hearing was an in-person public hearing held on January 12, 2023, from 5:00 pm to 7:00 pm, at Cathedral High School's Gymnasium, and within 10 calendar days before the close of the public comment period on January 17, 2023. Because there were disruptions at the January 12, 2023, in-person public hearing, Metro held a fourth public hearing after the close of the public review period on February 8, 2023 via Zoom webinar to provide an additional opportunity for attendees to provide verbal testimony. The fourth public hearing was a virtual public hearing held on February 8, 2023, from 5:00 pm to 8:00 pm, via Zoom webinar.

SB 44 requires that the lead agency hold the "public hearing to receive testimony on the draft environmental impact report." (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(4).) Each of the four public hearings provided an opportunity for Metro to receive testimony on the Draft EIR in compliance with SB 44. While not required by SB 44 for the public hearings, project materials and information were also made available at the public hearings, as it was at the informational workshops, in order to inform the public of the key analyses and conclusions of the Draft EIR.

The format of the two in-person public hearings was a public comment opportunity where Metro received verbal and written testimony on the Draft EIR from attendees, as well as an open house, consistent with Metro's standard practice, during which attendees could be informed of the proposed Project's key analyses and conclusions. Spanish, Mandarin, and Cantonese Interpreters were provided to assist attendees in need of interpretation, and printed materials providing additional information about the Draft EIR's key analyses and conclusions were provided in English, Spanish, Chinese (Simplified) and Chinese (Traditional). During the January 12, 2023, in-person public hearing, interpretation was also provided in Taishanese, in addition to Spanish, Mandarin, and Cantonese. Twelve stations with large,

printed boards providing additional information about the subject matter of each station, were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR and their key analyses and conclusions, one station dedicated to information on aerial rapid transit technology, and one station with a video presentation of the proposed Project. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station also included printed materials, including the presentation of the Draft EIR's key analyses and conclusions from the virtual public hearing, that attendees could review and/or take with them. A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review during the public hearing. In addition to the open house, Metro received testimony on the Draft EIR, in writing on forms provided by Metro, or verbally to the two court reporters who were set up at a "comment station." Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). The public hearings were staffed by Metro and Draft EIR preparer staff, subject matter experts, and the proposed Project team, who answered questions from attendees on the Draft EIR key analyses and conclusions.

The format of the first virtual public hearing held on December 13, 2022, was a presentation of the proposed Project, including the Draft EIR's key analyses and conclusions, followed by a public comment session where Metro received verbal testimony on the Draft EIR from attendees, which was recorded and subsequently transcribed by a court reporter.[6] Interpretation in Spanish, Mandarin, and Cantonese was provided in separate channels and slides were made available to attendees in English, Spanish, Chinese (Simplified) and Chinese (Traditional) on the lead agency's website. Verbal testimony made in Spanish, Cantonese, or Mandarin was translated to English, and court reporters subsequently recorded the English translation. Closed-captioning was also provided for ADA accessibility. The meeting was staffed by Metro and Draft EIR preparer staff, who gave the presentation and moderated the public comment session.

The format of the second virtual public hearing held on February 8, 2023, as a continuation of the January 12, 2023, public hearing to allow an additional opportunity for attendees to provide verbal testimony due to disruptions at the January 12, 2023, public hearing, was a public comment session where Metro received verbal testimony on the Draft EIR from attendees, which was recorded and subsequently transcribed by a court reporter. Verbal testimony made in Spanish, Cantonese, Mandarin, and Taishanese, was translated to English, and court reporters subsequently recorded the English translation. Closed-captioning was also provided for ADA accessibility. The meeting was staffed by Metro and Draft EIR preparer staff, who moderated the public comment session.

[6] Transcripts of the public comments during the virtual public hearings are included in Appendix B, Public Hearing Transcripts, of the Final EIR.

TOPICAL RESPONSE B
Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation

Comments on the Draft EIR raise issues related to the passenger arrival and queuing at the proposed Project's Alameda Station and Chinatown/State Park Station during the pre-Dodger game/event at Dodger Stadium and passenger departure and queuing during post-Dodger game/event at the Dodger Stadium Station. Comments also raise issues related to the proposed Project's coordination with planned improvements at Los Angeles Union Station ("LAUS"), including the planned LAUS Forecourt.

As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. As such, this topical response is provided only for informational purposes. While not required for transportation, as discussed in Section 3.13, Noise, of the Draft EIR, estimates of passengers at stations were used for data input to evaluate operational noise.

Ridership Model

Given the uniqueness of a gondola as a mode of transportation, a model specifically tailored to games and events at Dodger Stadium was developed to estimate ridership of the proposed Project, and the results of this model were used to project ridership and associated potential operational effects including queuing. As detailed in Ridership Model Development, included in Appendix N, Transportation Appendices, of the Draft EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit, parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data. Many of the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. As shown in Table 1 in Ridership Model Development, included in Appendix N, Transportation Appendices, of the Draft EIR, these data sources include zip codes of residence from Dodgers 2019 ticket sales, GIS ESRI's "Routable Network" to calculate travel times by car between zip codes and Dodger Stadium and between zip codes and LAUS, Metro and Metrolink timetables for travel times by transit, values of time extrapolated from U.S. DOT data, driving costs per mile estimated using vehicle miles per gallon data from the California Air Resources Board, actual parking costs for both Dodger Stadium and transit stations, and actual transit fares from Metro and Metrolink. The ridership model was calibrated by comparing the ridership estimated by the model for existing conditions to actual Dodger Stadium Express ridership counts and was then used to forecast future ridership.

As detailed on page 3.17-40 in Section 3.17, Transportation, of the Draft EIR, the ridership model estimated that 6,000 attendees would ride the proposed Project in 2026 per game/event and 10,000 attendees would ride the proposed Project in 2042 per game/event, reaching the estimated capacity of the system.

As noted on page 3.17-40 of the Draft EIR, for both pre-game/event and post-game/event, it was estimated that approximately 85 percent of the riders would board/deboard the proposed Project at the Alameda Station and 15 percent would board/deboard at the Chinatown/State Park Station based on Dodger ticket sales data by zip code and proximity of zip codes to the Metro L Line (Gold).

Pre-game Transportation

Queue Formation and Management

Ridership Projection

As stated above, there would be an estimated 6,000 pre-game/event riders for the proposed Project in 2026 and 10,000 pre-game/event riders in 2042. Given the assumption that 85 percent of riders would board at Alameda Station, there would be 5,100 riders in 2026 and 8,500 riders in 2042 at the Alameda Station. The remaining 900 riders in 2026 and 1,500 riders in 2042 would board at Chinatown/State Park Station.

Alameda Station

As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores at El Pueblo. There would be two access locations for the Alameda Station – the planned LAUS Forecourt to the east of Alameda Street and the proposed new pedestrian plaza at El Pueblo north of Placita de Dolores to the west of Alameda Street. It was assumed that approximately 70 percent of passengers would arrive from the planned LAUS Forecourt, due to its connection to the regional transit system at LAUS, and the remaining 30 percent of passengers would arrive from the proposed new pedestrian plaza at El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas at the station, would be introduced at-grade from the planned LAUS Forecourt and the new pedestrian plaza at El Pueblo.

The queues would be managed by efficient vertical circulation and by staff at the station. For the vertical circulation, there would be three escalators connecting the ground floor to the boarding platform from the planned LAUS Forecourt, and of those three, two would serve the peak direction (up in the pre-game/event period and down in the post-game/event period). From the new pedestrian plaza at El Pueblo, one escalator would operate in each direction. In addition, stairs and elevators would be available on both sides of the station. The station's boarding platform would have a queueing capacity of 300 passengers. The management of queues by staff could also be enhanced when needed, at busy times and to address specific circumstances if needs arise, such as directing passengers into specific locations for queuing.

Due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. Queueing is not expected to occur into the new pedestrian plaza at El Pueblo since the majority of riders are expected to board from the planned LAUS Forecourt.

More active queue management would become more frequently needed at the Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders. As indicated on page 3.13-52,

in Section 3.13, Noise, of the Draft EIR, the maximum queue on a Dodger Game Day scenario in 2042 was estimated to be 603 people at the Alameda Station. Of these 603 people, approximately 300 would be inside Alameda Station on the boarding platform, and the remaining 303 people would be queueing outside of the Station, within the planned LAUS Forecourt. Unlike existing bus and rail transit service with headways between six minutes or much longer (e.g., over an hour in some cases), the queue line for the proposed Project would constantly be moving due to the 23 second headways of the proposed Project. Based on the maximum queue length of 603 people and an hourly departure rate of 5,000 people per hour, a person at the end of the line would wait for an estimated maximum of seven minutes, before boarding the gondola cabin. Others would wait shorter durations.

The Draft EIR concluded that the Dodger Stadium Express's (DSE) slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would render the proposed Project substantially more competitive with driving time than the current DSE (see Draft EIR, pp. 4-63, 4-71). After a game, travel times on the DSE from Dodger Stadium to LAUS ranged from approximately 18 minutes to 49 minutes, compared with the estimated seven-minute travel time on the proposed Project. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with existing conditions.

In addition, timed tickets would be employed to manage the arrival of passengers on expected large turnout days. On large turnout days, game or event attendees planning on riding the proposed Project would be required to reserve a ticket for a specific time slot in advance. This would spread out the passenger arrivals and assist with queue management. Timed tickets are regularly employed at locations such as museums, particularly on busy days like weekends and holidays, to manage crowds and queuing.

Chinatown/State Park Station

As discussed in Section 2.0, Project Description, of the Draft EIR, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. As discussed above, approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station.

Access to the Chinatown/State Park Station boarding platform would be from the mezzanine level via elevators and stairs. Comprised of three levels, elevators and stairs from the ground level would lead up to a mezzanine level, and ramps for the queuing area would lead up to a boarding platform. The mezzanine level would allow for internal circulation within the station and would also provide additional queueing space within the station.

Given that the boarding demand would be less than at the Alameda Station (15 percent of total ridership at the Chinatown/State Park Station versus 85 percent at the Alameda Station) and the larger queueing capacity at the Chinatown/State Park Station due to the ability to accommodate a mezzanine level in the

station's design,[7] the queue is expected to be fully accommodated within the Chinatown/State Park Station and is not anticipated to extend outside of the station.

In addition to serving Dodger games and events at Dodger Stadium, the proposed Project would also serve events at the Los Angeles State Historic Park. As described on page 3.17-26, in Section 3.17, Transportation, in the Draft EIR, the analysis assumed a 10 percent capture rate for rides between LAUS and the Los Angeles State Historic Park for an average sized event (ranging from craft fairs drawing 6,000 to 8,000 people per event to evening concerts drawing 12,000 to 20,000 people per event, averaging 11,200 people per event), meaning that 10 percent of the attendees would ride the proposed Project. Queues for events at the Los Angeles State Historic Park would also be accommodated within the Chinatown/State Park Station and are not anticipated to extend outside the station since the station will have queuing capacity on both the mezzanine and boarding levels. In addition, riders seeking to utilize transit from the Chinatown/State Park Station to LAUS also have the choice of using the Metro L Line (Gold) Station, which will benefit from the proposed Project's proposed pedestrian access enhancements, which could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, which proposes hardscape and landscape improvements, shade structures, and potential seating.

Post-game Transportation

Queue Formation and Management

As discussed in Section 2.0, Project Description, of the Draft EIR, the Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate. The boarding platform and the passenger queueing area would be at-grade.

Certain Draft EIR comments suggest that post-game/event ridership on the proposed Project would be less than pre-game ridership due to factors such as the relatively longer queues to board compared to pre-game/event, and the more limited operation of the regional transit system at LAUS in the post-game period after evening games and events (see response to operation of the regional transit system comment in the Post-Game Transit System section below). The ridership modeling for the proposed Project took this into account and incorporated the expected drop in post-game ridership compared to pre-game that is seen today for the Dodger Stadium Express. As discussed in Section 3.17, Transportation, of the Draft EIR, based on data from the 2019 season, the post-game ridership for Dodger Stadium Express ranged from being similar to pre-game ridership (weekend games), or up to approximately 8 percent less than the pre-game ridership (weekday evening games) due to factors such as attendees arriving to weekday evening games from different work locations but traveling home together.

Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much

[7] A mezzanine level was included in the design of the Chinatown/State Park Station to allow access to both sides of the platform while minimizing the vertical circulation footprint at ground level in the Los Angeles State Historic Park. The Alameda Station does not include a mezzanine because it provides access to both sides of the boarding platform via vertical circulation from the planned LAUS Forecourt on the east and the proposed new pedestrian plaza at El Pueblo on the west.

like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza.

Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed below, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. This is in contrast to the Dodger Stadium Express, which has much longer gaps in bus departures (from a minimum of 3 minutes to a maximum of 19 minutes spacing between bus departures based on 2023 season observations further described below) leading to static queues that build substantially over time as departure frequency is substantially less frequent than the proposed Project.

In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These games were selected to reflect the mix of game times, days, and opponents. As noted below, the service time from the first bus departure to the last bus departure was nearly 2 hours, with the last bus departing up to 90 minutes after the end of the game. The amount of time between the end of each game and the departure of the last bus varied, with the June 15th and June 16th games both going into extra innings. Additionally, the June 16 game had a post-game drone show. While the Dodger Stadium Express has the capacity to carry approximately 1/5th of the riders of the proposed Project, its service time needed to load all riders is equivalent to that of the proposed Project in 2042, and longer than the needed service time for the proposed Project's 2026 opening year ridership estimate.

- Sunday, June 4, 2023 (Yankees) —1 hour 50 minute service time; 1 hour 30 minutes post-game
- Thursday June 15, 2023 (White Sox) — 1 hour 54 minute service time; 49 minutes post game (game ended in 11th inning)
- Friday, June 16, 2023 (Giants) — 2 hour 27 minute service time; 52 minutes post game (game ended in 11th inning)
- Saturday, June 24, 2023 (Astros) — 1 hour 15 minutes service time; 1 hour 15 minutes post-game

As noted above, the minimum observed time for a bus to load and depart was approximately 3 minutes, using both the rear and front door. This performance was achieved when the waiting passenger queue exceeded the capacity of buses, and therefore passengers were immediately ready to board. Observed maximum passenger loads for buses under these loading conditions was approximately 65-75 passengers.

As detailed in Topical Response J, Gondola Design and Operations, the proposed Project's 3S cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. Assuming a capacity of 35 passengers per cabin, the proposed Project would carry up to approximately 5,000 pphpd. Therefore, the proposed Project can load an equivalent number of passengers in 2-3 cabins as one Dodger Stadium Express bus. However, as detailed in Topical Response J, multiple cabins would load simultaneously at slower speeds, but would be spaced every 23 seconds, therefore serving the same passenger demand as a Dodger Stadium Express bus in 46-69 seconds (2-3 cabins x 23 second headways) compared with at best 3 minutes for Dodger Stadium Express.

Once all Dodger Stadium Express buses in operation depart for LAUS, headways spaced out due to traffic congestion and overall run time between Dodger Stadium and LAUS. The longest time between bus departures was observed to be 19 minutes. During this 19 minute time period, the passenger queue either remained static, or grew as additional riders entered the queue following their exit from Dodger Stadium.

In contrast, within the same approximately 1/3 of an hour between Dodger Stadium Express departures at its longest headway, the proposed Project could serve approximately 1,667 passengers on average (5,000/3=1,667), which is approximately 90 percent (1,667/1,840) of the average 2019 season one-way passenger load of 1,840 carried by the Union Station Dodger Stadium Express in total for an entire game.

The observed length of the Dodger Stadium Express post-game passenger queues was substantial. For example, the longest queues observed at the Yankees game on June 4 and the Astros game on June 24 ranged from 400 to 775 feet (the lines for the two extra-inning games were not as long since the extra innings stretched out the departures), with passengers typically standing two to four persons abreast.

These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service. An additional indicator that Dodger fans have a willingness to wait for transit following a game is that fact that the Golden State Gate C cleared before the last Dodger Stadium Express bus departed at each of the games observed.

While the proposed Project would substantially improve the service level and reduce passenger queueing compared with the Dodger Stadium Express, queuing to ride post-event transit systems is a common phenomenon at athletic events, concerts, and other events and most large stadia and arenas. As noted above, attendants would be available to assist with management of queuing as needed.

Proposed Project Versus Other Modes

Certain Draft EIR comments suggest that passengers of the proposed Project may prefer to leave Dodger Stadium in other modes, such as the Dodger Stadium Express, rideshare, or even walking, due to the queues to board the proposed Project.

Dodger Stadium Express

As detailed on page 4-63, in Section 4.0, Alternatives, of the Draft EIR, the travel times for the Dodger Stadium Express ranged from approximately 18 minutes to 49 minutes post-game (which occurred on opening day), based on data for the 2019 season. Excluding the opening day travel time outlier, the post-game travel ranged from approximately 18 minutes to 24 minutes. These travel times are three to seven times the seven-minute travel time on the proposed Project, plus the longer loading time for the Dodger Stadium Express buses compared to the proposed Project cabins. In addition to the longer travel time, the Dodger Stadium Express travel times are more variable than the fixed seven-minute travel time for the proposed Project. In addition, the travel time for the proposed Project is not affected by factors such as congestion leaving the stadium, the congestion in the streets, and unexpected delays such as collisions and road closures the way that Dodger Stadium Express is today.

More information on the Dodger Stadium Express alternative can be found in the discussion of the Transportation Systems Management Alternative in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options.

Rideshare/Transportation Network Company

As shown on page 28 of the Ridership Model Development, in Appendix N, Transportation Appendices, of the Draft EIR, data from the 2019 season indicated a Transportation Network Company (TNC) average share of 5 percent of game attendees at Dodger Stadium. This 5 percent share of game attendees on TNCs is included in the 2026 and 2042 forecast of game attendees leaving Dodger Stadium. Based on 2019 season data, TNC vehicle counts are higher for pre-game conditions compared with post-game conditions, likely due to an increase in average vehicle occupancy (AVO) post-game, as some game attendees may arrive separately (e.g., from different places of work), but depart together. This pattern is expected to continue with the proposed Project, since TNC access to the proposed Project is expected to be similar to Dodger Stadium. As described on page 3.17-28 of the Draft EIR, post-game TNC vehicle counts collected at Dodger Stadium are lower than pre-game TNC vehicle counts, indicating that TNCs are fuller post-game than pre-game, potentially because groups whose members travel to the game separately from two different origins may leave the game together, whether in a TNC or a private vehicle. These travel patterns are taken into account in the VMT analysis of the proposed Project.

Walking

While there are some game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on proposed Project, and the path would be on a steep downward grade that does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility. The walk times for an average walker would take approximately 25 minutes from the proposed location of the proposed Dodger Stadium Station to the Metro L Line (Gold) Station and 35 minutes to LAUS, compared to the three-minute ride to the Chinatown/State Park Station (over eight times faster) and the seven-minute ride to the Alameda Station (over five times faster) on the proposed Project. Walking is not expected to substantially increase post-game as a result of the proposed Project. A project alternative, the Pedestrian Enhancement Alternative, with widened and improved sidewalks with enhanced safety features, and an escalator up the hill to Dodger Stadium, was considered but dismissed due to limitations on travel time and grade. More information on this project alternative can be found in discussion of the Pedestrian Enhancement Alternative in Section 5.0, Corrections and Additions, of this Final EIR.

Post-Game Transit System at Los Angeles Union Station

Draft EIR comments acknowledged the reduced operation of the regional transit system at LAUS in the late evening upon arriving to LAUS after riding the proposed Project after a game or event at Dodger Stadium. The limited operation of the regional transit system in the evening is a condition faced by riders of the Dodger Stadium Express today. Based on 2019 season data, there is an approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game. The proposed Project model assumed this same reduction for the post-game ridership estimates for the proposed Project. To be conservative, the full reduction of post-game ridership is assumed to shift

to TNCs, which are estimated to generate more VMT than private vehicle trips due to the VMT generated by the driver traveling to the pick-up location at Dodger Stadium.

The specific future transit network for buses and service hour and service frequency for buses and trains, cannot be fully known since Metro, Metrolink, and municipal transit operators adjust their bus routes and service hours frequency approximately every six months. Metro's goal as an agency is to continue to expand and improve the service provided on the regional transit network. As stated on page 3.17-4, in Section 3.17, Transportation, of the Draft EIR, Metro presented the vision to improve transit infrastructure and service in the 2020 Long Range Transportation Plan.[8] There are several planned and funded rail and bus rapid transit projects expected to open between 2023 and 2042, including the Downtown Regional Connector (which opened in June 2023), the Purple Line Extension to West Los Angeles, the West Santa Ana Branch, the completion of the K (Crenshaw) Line, the Gold Line Foothill Extension Phase 2B, and others. In January 2023, Metrolink was awarded nearly $107 million of state funds to implement improvements to the regional rail system. The NextGen Bus Plan, a major restructuring of bus routes which Metro adopted in 2020, has a goal to "improve and expand midday, evening and weekend service, creating an all-day, 7-day-a-week service."[9]

The Project Sponsor would coordinate potential improvements to late night service with Metro, Metrolink, and other transit service providers.

Coordination with Metro on the Planned LAUS Forecourt

Comments suggest the potential for the proposed Project and passenger queueing to interfere with other proposed plans for the planned LAUS Forecourt.

As described in Section 2.0, Project Description, of the Draft EIR, Metro's LAUS Forecourt and Esplanade Improvements Project ("Forecourt and Esplanade Project") is currently being developed in coordination with the City of Los Angeles, and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street.

As described on page 5-42 in Section 5.0, Other CEQA Considerations, of the Draft EIR, the West Santa Ana Branch Transit Corridor Project ("WSAB Project") involves the construction of a new light rail transit line between Downtown Los Angeles and Artesia. On January 27, 2022, the Metro Board selected a Locally Preferred Alternative for the initial opening segment between the proposed Pioneer Station and the A Line Slauson Station. The ultimate terminus would be at Union Station, with two alternatives, either within the planned LAUS Forecourt or behind the Metropolitan Water District building.

As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station location is compatible with Metro's existing plans at LAUS, including the Forecourt and Esplanade Project.

The Forecourt and Esplanade Project would repurpose the existing northwestern LAUS parking lot into a new civic space with sustainability features. The proposed Project, as well as other projects like the WSAB Project, have proposed plans that could have access within the planned LAUS Forecourt. The current plans

[8] Los Angeles County Metropolitan Transportation Authority, 2020 Long Range Transportation Plan (2020).
[9] Los Angeles County Metropolitan Transportation Authority, NexGen Bus Plan (2020).

for WSAB reflect a subterranean station with a portal within the Forecourt, which would have vertical circulation that would meet at the same general proposed location as the vertical circulation for the proposed Project. The Project Sponsor has coordinated with Metro on the design and placement of the proposed Project's Alameda Station and its vertical circulation, and the planned LAUS Forecourt design would reflect the presence of the proposed Project's Alameda Station. Since the planned LAUS Forecourt has not yet been designed or funded, the ultimate design of the Forecourt would take into consideration the other projects such as the proposed Project and the WSAB Project. The proposed Project would not preclude the other planned activities and projects in this area.

TOPICAL RESPONSE C
Project Features

Comments on the Draft EIR requested additional information as to how the proposed Project would take into account the current needs of the surrounding communities, including economic barriers and social challenges with access to transit, and provide an opportunity to local community stakeholders to have a decision-making role in how to showcase the surrounding art and culture, including utilizing local artists. In addition to the potential to alleviate existing congestion and associated air pollution in the Project area, which includes communities disproportionately burdened by multiple sources of air pollution, the proposed Project seeks to provide a number of features to enhance and provide additional benefit to the surrounding community, including but not limited to the following:

- Sustainability features at the stations, towers, and junction and open space enhancements at the Los Angeles State Historic Park
- Community Access Plan to allow local residents and employees of businesses close to the proposed Project to ride the gondola using their Metro fare at no additional cost
- Pedestrian access enhancements along the proposed Project alignment, including landscape and hardscape improvements, shade structures, and potential seating
- Access to the Los Angeles State Historic Park and Elysian Park
- Mobility hubs at Chinatown/State Park Station and Dodger Stadium Station
- Wayfinding signage adjacent to and throughout the proposed Project alignment
- Utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture and history
- Design of the proposed Project components inspired by adjacent neighborhood culture and history
- Interpretation Plan to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community
- Marketing plans to help promote the adjacent business areas, while honoring the rich history and cultural significance of each area
- Business and Community Support Program during construction
- Partnerships with local businesses and nonprofits along the proposed Project alignment
- Commitment to a goal of utilizing at least 35 percent MBE/WBE/DBE/SBE/DVBE/LGBTQ-owned businesses[10] during the proposed Project's construction phase

The Project Sponsor will convene stakeholder groups to ensure adequate vetting and consensus around community features of the proposed Project.

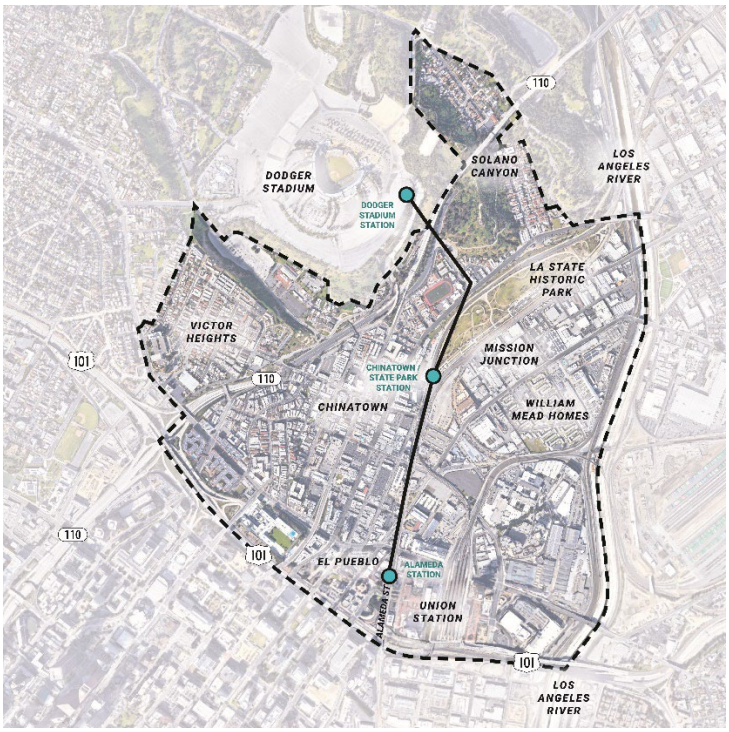
[10] MBE/WBE/DBE/SBE/DVBE/LGBTQ refers to minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses.

Sustainability Features and Open Space Enhancements

As discussed in Section 2.7.9, Sustainability Features, of the Draft EIR, the proposed Project would include several sustainability features, including the installation of landscaping at the Alameda Station, Alpine Tower, Chinatown/State Park Station, Stadium Tower and Dodger Stadium Station, which would include drought tolerant landscape features and low water use irrigation strategies. The station, junction, and tower hardscape materials would also be selected to reduce Solar Reflective Index values to minimize the heat island effect. At the Chinatown/State Park Station, shade structures and potential seating would be included. The proposed Project would also provide open space enhancements at the Los Angeles State Historic Park and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.

Community Access Plan

The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. The graphic below demonstrates the geographic area for the Community Access Plan applicability. Moreover, under the Community Access Plan, transfers to and from the Metro regional transit system and the proposed Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). Residents and employees of businesses located within the communities adjacent to the proposed Project alignment would only pay the rate they pay to ride the Metro system to the proposed Project. The proposed Project would also be free to ride for anyone with a ticket to a Dodger game.



Pedestrian Access Enhancements

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access

enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS, as well as the businesses at El Pueblo and downtown Chinatown. The proposed Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

To facilitate this transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge, discussed in greater detail below. The proposed Project would also include pedestrian enhancements and drought tolerant landscaping and open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. Implementation of the proposed Project's Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, and both the Alameda Tower and Alpine Tower will provide additional hardscape and landscape updates around the tower bases.

Access to Parks

The proposed Project would provide daily transit service to visitors of the Los Angeles State Historic Park and Elysian Park. The Los Angeles State Historic Park hosts various events throughout the year including craft markets, concerts, movie nights, and festivals. These events attract visitors from the surrounding local communities and throughout the region who can access the park from the proposed Project. While not proposed as part of the Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, and between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at the Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options.

Mobility Hubs

The proposed Project would include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program.

Wayfinding Signage

The proposed Project would include multilingual signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, as well as directional and pedestrian signage adjacent to and throughout the proposed Project as necessary to facilitate access and safety, which would be illuminated in conformance with all applicable requirements of the Los Angeles Municipal Code. This wayfinding signage would help to promote connectivity between destinations including El Pueblo, Chinatown, Los Angeles State Historic Park, Elysian Park, and Dodger Stadium.

Utilization of Local Artists to Reflect the Unique Neighborhood Culture and History

As discussed in Section 2.0, Project Description, of the Draft EIR, each station could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture. The proposed Project has also committed to one "Art Cabin" that could feature artwork commissioned from local artists. Refer to page 106 of the Lighting Study attached to Appendix C, Visual Impact Assessment, of the Draft EIR, for a conceptual, illustrative rendering of the "Art Cabin." As discussed in Section 3.01, Aesthetics, of the Draft EIR, Metro's public art policy mandates that art be displayed throughout Metro's transportation network in order to activate and enliven public spaces that otherwise serve a functional purpose. While not subject to the requirements of the public art policy, the proposed Project would expand the number of opportunities where local artists can display their work, consistent with the public art policy. As discussed in Topical Response M, Comparable Systems, of the Final EIR, the "Mexicable" system in Mexico City, Mexico, has galvanized the creation of public art, with as many as 52 works of street art and sculptures surrounding the system's alignment. The Mexicable enabled collaborations with numerous local and international artists to design public art that now line the system's alignment to be viewed by passengers and local residents. Similar to the Mexicable, the proposed Project could also identify additional sites for commissioned murals or art installations along the proposed Project alignment.

The proposed Project would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

The Design of Proposed Project Components Would Be Inspired by Adjacent Neighborhood Culture and History

Each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, and which would be discussed with identified stakeholder groups. As discussed in Section 2.0, Project Description, and Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would not adhere to a fixed, Procrustean[11] design across the entire system, but each individual component would be designed to weave seamlessly into the surrounding urban fabric and the characteristics of the surrounding neighborhoods, and the colors and material finishes of each station and junction would be chosen to be complementary to each of their respective sites. As stated in Section 2.0, Project Description, of the Draft EIR, the proposed architectural design employs a simple barrel vault form,

[11] "Procrustean" design refers to design that is designed to produce conformity.

which utilizes a hollow structural steel section structure and metal panel assembly to allow the introduction of custom perforation patterns that take cues from the immediate neighborhood culture, while also providing a visual lightness to the form. Likewise, the neutral light-tone grey of each tower would be intended to conform with the surrounding urban environment and will not provide a highly metallic or mirrored finish to minimize glare. Further, as discussed in Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would be consistent with the goals of the City of Los Angeles' General Plan Framework Element regarding urban form and design and would support the Silver Lake – Echo Park – Elysian Valley Community Plan's aim to "provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with architectural themes of the neighborhood." Moreover, the proposed Project would support the goals and objectives of the City's General Plan Framework to "improve the quality of the public realm through Project design, which would promote accessibility via improved pedestrian pathways that would be complementary and appropriate to the character of the existing buildings in the surrounding area," and the Central City North Community Plan's objective to "enhance the appearance of commercial districts," by selecting color, lighting, surface texture accents, and building materials to complement the architectural themes of each individual neighborhood.

Interpretation Plan

The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, the Dodger Stadium property and its history as it relates to Chavez Ravine, and Elysian Park.

Business and Community Support Program During Construction

During construction of the proposed Project, the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by construction activities.

The Business and Community Support Program would provide assistance to local businesses, including advertising support in a local or regional newspaper and on social media, and funding for temporary signage and advertising during construction to help businesses where access has been affected due to construction activity. The Program would also provide notice of the schedule for planned construction activities, lane closure schedules and information, and any required short-term modifications to property access, as well as access plans that ensure that all businesses are provided with adequate access during construction. The proposed Project would also implement its Construction Traffic Management Plan, as discussed in Section 3.17, Transportation, and as shown in Appendix B, Construction Assumptions, of the Draft EIR, that would include detours and ensure that emergency access is maintained throughout all construction activities. Materials shall be provided in English, Spanish, Chinese (Traditional), and Chinese (Simplified). This Program would also provide notice to property owners regarding utility relocations, which as discussed in Section 3.19, Utilities and Service System, of the Draft EIR would be implemented pursuant to the proposed Project's Utility Relocation Plan in coordination with the Los Angeles

Department of Water and Power and with the utility companies to minimize impacts to services during construction. In addition, this Program would provide methods by which residents and business owners can convey their concerns about construction activities and the effectiveness of measures during the construction period so activities can be modified to reduce adverse effects.

Partnerships with Local Businesses

The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including MBEs, WBEs, DBEs, SBEs, DVBE, and LBGTQ-owned businesses. In addition to providing accessible and affordable mobility options for these businesses' employees, the proposed Project would create economic opportunities for potential partnerships with these businesses. As discussed in Appendix A, Scoping Report, of the Draft EIR, the proposed Project's team engaged in extensive outreach to local businesses and institutions to listen to and learn from the local community in order to pursue equitable outcomes.

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within the impacted communities of El Pueblo, Chinatown, Solano Canyon, Victor Heights, and Mission Junction, while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors, and represents an opportunity to increase pedestrian traffic along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to El Pueblo, Chinatown and other areas along the proposed Project alignment, which, consequently, adds revenues to these businesses in the communities the proposed Project hopes to serve. For example, as discussed in the Parking Study, the proposed Project could implement business to business partnerships with local businesses to pre-sell bundled packages that include patronage at the local business, as well as off-street parking, and a ticket to ride the proposed Project.

As discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the locations of the proposed Project's Alameda Station and Chinatown/State Park Station optimize pedestrian access, driving customers to local businesses. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The proposed Project, in addition to helping to promote and provide added connectivity to the Chinatown area, also would locate its Chinatown/State Park Station within a 3-minute walk to/from Metro's L Line (Gold) Chinatown Station as a way to drive additional foot traffic to Chinatown and provide direct access to the Los Angeles State Historic Park. The proposed Project would provide area residents and businesses with transit access to local businesses and institutions. The proposed Project could partner, for example, with the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses and institutions.

Partnerships with local businesses and nonprofits could also include an overall marketing plan on how best to market the 'gondola' to the benefit of the region; this may include additional monies for specific marketing of identified areas along the proposed Project alignment, in addition to grant-based assistance for anti-displacement strategies.

The Project Sponsor is in the process of and will continue convening stakeholder groups to coordinate on partnerships with local businesses.

The Project Sponsor's Commitment to Utilizing MBE/WBE/DBE/SBE/DVBE/LGBTQ-owned Businesses During Construction

The Project Sponsor has committed to a goal of 35 percent utilization of MBEs, WBEs, DBEs, SBEs, DVBEs, and LGBTQ-owned businesses during the proposed Project's construction phase.

TOPICAL RESPONSE D
Metro Is The Proper Lead Agency For The Proposed Project As The Region's Transportation Authority; Metro Named And Consulted With The Applicable Responsible Agencies

Comments on the Draft EIR address the role of Metro as CEQA lead agency for the proposed Project. Comments suggest that the City of Los Angeles ("City") should serve as the lead agency due to the discretionary approvals required for the proposed Project from the City and other factors. Under CEQA and as the region's transportation authority, Metro is properly designated as lead agency for the proposed Project. Metro owns Los Angeles Union Station ("LAUS"), Southern California's primary transportation hub, which provides local and regional access via multiple modes of transport and service providers including Metro, Metrolink, Amtrak, and municipal and private bus operators. The proposed Project would commence adjacent to LAUS and would operate daily, providing a high-capacity aerial rapid transit connection between the regional transit system accessible at LAUS and the Dodger Stadium property and the surrounding communities, including Chinatown, Mission Junction, the Los Angeles State Historic Park, and Elysian Park.

Comments on the Draft EIR also suggest that Metro did not properly name responsible agencies, and failed to properly consult with all such agencies. However, Metro identified, provided notice, and consulted with responsible agencies in full compliance with CEQA. Responsible agencies for the proposed Project were identified as the California Department of Transportation ("Caltrans"), the California Department of Parks and Recreation ("State Parks"), the California Division of Occupational Safety and Health ("Cal/OSHA"), and the City.

Metro Is the Appropriate Lead Agency as the Region's Transportation Authority and the Agency With Primary Responsibility for Supervising, Carrying Out, or Approving the Proposed Project

Metro is appropriately designated as lead agency under CEQA for the proposed Project's environmental review because Metro has "the greatest responsibility for supervising or approving the project as a whole."[12]

Under CEQA, lead agency "means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" and in ensuring overall compliance with CEQA.[13] In the case of a project to be carried out by a nongovernmental person or entity, as is the case for the proposed Project, the lead agency "shall be the public agency with the greatest responsibility for supervising or approving the project as a whole."[14]

As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro is the appropriate lead agency for the proposed Project. Under the County Transportation Commissions Act, the State Legislature provided Metro with broad authority over public

[12] CEQA Guidelines Section 15051[b].
[13] California Public Resources Code Section 21067; CEQA Guidelines Section 15367.
[14] CEQA Guidelines Section 15051(b) [emphasis added].

transportation planning and coordination for the Los Angeles region.[15] This Act declares that Metro shall aim to "achieve the operation of a coordinated and integrated transportation system which will reduce automobile usage and dependency, reduce the consumption of scarce and expensive energy fuels, and reduce the levels of automobile-related air pollution."[16] Metro is authorized to "[d]o ***any and all things*** necessary to carry out" these purposes.[17] As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide an aerial rapid transit option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. Accordingly, the proposed Project is consistent with Metro's statutory purpose.

Consistent with Metro's statutory purpose to operate an integrated transportation system that reduces automobile usage, and as discussed in Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, Metro is tasked with considering approval of the proposed Project's plans for design, construction, and implementation under Public Utilities Code section 130252,[18] as well as with consideration of the written approvals to operate the proposed Project, including an easement or other agreement or approval to authorize construction and operation of the project within a portion of LAUS pursuant to Public Utilities Code section 130521 and Civil Code section 801, and an encroachment permit. These potential approvals are consistent with the State Legislature's grant of authority to issue approvals for transportation projects to Metro. Metro's approvals are necessary for the proposed Project to operate.

The proposed Project would become a part of the regional transportation system that state law tasks Metro with overseeing. If the proposed Project is approved, Metro would have the primary responsibility for implementing the proposed Project as part of this regional transportation system, consistent with Metro's statutory purpose. Therefore, Metro is the appropriate lead agency for the proposed Project. However, some commenters claim that because the City has approval authority over more discretionary approvals than Metro, the City is the appropriate lead agency.

Under CEQA, where two or more public agencies meet the criteria for acting as lead agency under CEQA Guidelines section 15051(b), the agency that acts first will normally serve as lead agency.[19] Here, consistent with Metro's statutory purpose and responsibility for implementing the proposed Project, Metro will act first to review and consider certification of the proposed Project's Final EIR, as well as to consider the approval of the proposed Project's plans for design, construction, and implementation. Metro elected to serve as lead agency, and the City has not disputed this designation and has cooperated as a responsible agency. CEQA provides for the state to settle lead agency disputes under CEQA Guidelines section 15053. The state shall designate a lead agency based on the criteria in CEQA Guidelines section 15051, as well as the capacity of the agency to adequately fulfill the requirements of CEQA. CEQA Guidelines section 15051 also notes that where two or more public agencies have a "substantial claim" to

[15] Public Utilities Code. 1976. Section 130000, et seq.
[16] Id., § 130001(b).
[17] Id., § 130105(f) [emphasis added]; see also id., at §§ 130050, 130050.2, 130051.13, 130051.14, 30001(a).
[18] Public Utilities Code section 130252 provides that "All plans proposed for the design, construction, and implementation of public mass transit systems or projects" are to be submitted for Metro for potential approval.
[19] CEQA Guidelines Section 15051(c).

serve as lead agency, the agencies may designate one agency as lead agency by agreement.[20] Neither the state designation or agency agreement designation process was invoked because the agencies involved in the proposed Project agreed that Metro was the appropriate lead agency.

Responsible Agencies

Under CEQA, a responsible agency is "a public agency, other than the lead agency, which has responsibility for carrying out or approving a project."[21] In other words, responsible agencies are agencies, other than the lead agency, that have some discretionary authority for carrying out or approving a project.[22] While the lead agency is responsible for considering all environmental impacts of the project before approving it, a responsible agency has a more specific charge: to consider only those aspects of a project that are within an area of expertise of the agency or that are required to be carried out or approved by the agency.[23] The responsible agency has authority to mitigate or avoid the environmental effects of only those parts of the project which the responsible agency is called upon to carry out or approve.[24] Similarly, a responsible agency may disapprove a project in order to avoid only those environmental effects of the part of the project that the responsible agency would carry out or approve.[25]

Responsible Agencies Were Properly Identified and Properly Notified of the Preparation and Completion of the Draft EIR

The responsible agencies for the proposed Project are identified in Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, and were identified as Caltrans, State Parks, Cal/OSHA, and the City. Contrary to a commenter's claim, the California Public Utilities Commission ("CPUC") has no discretionary approval authority related to the proposed Project. As discussed above, pursuant to the County Transportation Commissions Act, the State Legislature granted Metro the authority to approve and consider transit projects within Los Angeles County.

As reflected in Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of this Final EIR, the four responsible agencies were given proper notice of preparation of the Draft EIR and notice of completion of the Draft EIR, including being provided with copies of the Draft EIR and an opportunity to comment, as CEQA requires.[26]

Metro Engaged in Consultation with Responsible Agencies Early in the CEQA Process and Continues Such Consultation

Under CEQA, responsible agencies are encouraged to consult with the lead agency.

As discussed in Section 8.0, List of Preparers, of the Draft EIR, Metro engaged in required consultation with all responsible agencies during the process of preparing the Draft EIR for the proposed Project, in compliance with CEQA. This consultation process included meetings with Metro and the responsible agencies to discuss the scope and content of the environmental information that Metro would include in

[20] CEQA Guidelines Section 15051(d).
[21] California Public Resources Code Section 21069.
[22] CEQA Guidelines Section 15381.
[23] See California Public Resources Code Sections 21104, 21153(c), 21069.
[24] CEQA Guidelines Sections 15041, 15096(g)(1).
[25] CEQA Guidelines Section 15042.
[26] California Public Resources Code Section 21080.4(a); CEQA Guidelines Section 15096(b)(2).

the Draft EIR,[27] additional consultation with the City and State Parks as Draft EIR preparers, and receiving comments from these responsible agencies on the Draft EIR.[28] This consultation process will continue throughout the course of the environmental review process. Consultation helps ensure that the EIR includes the necessary analysis regarding environmental effects within a responsible agency's jurisdiction to allow that agency to rely on the EIR, if ultimately certified, when considering the necessary approvals for the project that fall under its regulatory authority. If Metro certifies the Final EIR, each responsible agency will then conduct its own discretionary review process for the Project approvals for which it is responsible.[29]

[27] California Public Resources Code Section 21080.4(b); CEQA Guidelines Section 15104.
[28] California Public Resources Code Section 21153(c); CEQA Guidelines Section 15086(c).
[29] See Draft EIR, Section 2.0, Project Description, pp. 2-57-2-62.

TOPICAL RESPONSE E
The Proposed Project Will Not Displace Housing or Prevent Planned Housing

Comments on the Draft EIR address the proposed Project's location near existing and planned housing.[30] This topical response provides an overview of the proposed Project's consistency with existing and planned and proposed housing in the vicinity of the proposed Project.

The Proposed Project Will Not Displace Any Housing

As discussed in Section 3.14, Population and Housing, of the Draft EIR, no displacement of existing residences or housing would occur in connection with construction or operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property. The proposed Project is intended to accommodate existing and future transportation needs of the area's population. As discussed on page 3.14-14, in Section 3.14, Population and Housing, of the Draft EIR, "the proposed Project area is being developed with various mixed-use developments," including various "planned or recently constructed high-density developments." The proposed Project would support the City's goals of providing transit near residential development. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, one of the proposed Project's objectives is to "maximize the use of ROW, and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses." The proposed Project was designed in accordance with this objective. As discussed in Section 2.5.1, Proposed Project Alignment, of the Draft EIR, the "proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses."

Section 2.0, Project Description, and Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR provide an overview of the proposed Project alignment, showing the portions of the proposed alignment over public ROW and publicly owned property and the portions over private property. As shown in Section 2.0 and Appendix Q, the proposed Project alignment maximizes the use of the public ROW and publicly owned property, minimizing aerial rights required over private properties (including both existing and future adjacent land uses). Figure 2-8: Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property, in Section 2.0, Project Description, of the Draft EIR, shows the minimal amount of private property where aerial rights may be required for the proposed Project.

As discussed in Section 2.0, Project Description, and Section 3.14, Population and Housing, of the Draft EIR, the proposed Project would increase connectivity in downtown Los Angeles by providing direct linkages to major residential, employment, recreational, and tourist destinations, such as Los Angeles Union Station (LAUS), El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. Residents in existing and planned housing in the Project area would be connected to parks and recreational opportunities, including the Los Angeles State Historic Park and Elysian Park, the City's second-largest park. In addition, as discussed in Section 3.14, Population and Housing, of the Draft EIR,

[30] To the extent comments concern impacts to existing housing, the Draft EIR fully analyzed and considered the proposed Project's potential impacts to existing housing projects as part of the baseline physical conditions by which a lead agency determines whether an impact is significant, i.e., the environmental setting. (CEQA Guidelines § 15125; see also Draft EIR Sections 2.0, 3.01, 3.02, 3.03, 3.04, 3.05, 3.06, 3.07, 3.08, 3.09, 3.10, 3.12, 3.13, 3.14, 3.15, 3.16, 3.17, 3.18, 3.19, 3.20.)

approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. Implementation of the proposed Project would provide additional access and mobility by providing a transit option to/from LAUS and Chinatown and other employment areas in downtown Los Angeles that would avoid congested local roadways and provide a transit option to Dodger Stadium on game days and for special events that would bypass typical vehicle traffic. As discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, given that the area in the City where the proposed Project alignment is located is densely urbanized and there are existing planned developments for the area, the proposed Project would be a benefit for existing and planned uses in the area as an additional transit option. Therefore, the proposed Project would not displace housing, but would provide a benefit to existing residents in the area.

Consistent with the Project Objectives, the Proposed Project Was Designed In Consideration of Planned or Anticipated Housing Projects, Including the Restorative Justice Master Plan and Hope Village Project

Commenters suggest that the proposed Project would be inconsistent with the Restorative Justice Village Master Plan. In 2021, County of Los Angeles Supervisor Hilda Solis introduced a motion to create a Master Plan for housing services in the vicinity of the Men's Central Jail, called the "Restorative Justice Village Master Plan."[31] Supervisor Solis' motion references Homeboy Industries' plans to expand its campus, via a partnership with the City to offer transitional housing and daycare and to increase capacity to offer programs and job opportunities to formerly incarcerated and previously gang-involved community members. The motion specifically discusses Homeboy Industries' anticipated transitional housing project at 903 North Main Street, described below. The "Hope Village Project,"[32] is intended to serve a mix of unhoused and formerly incarcerated residents, integrating and connecting the Men's Central Jail, LA's Care First Village, Homeboy Industries, and The California Endowment's Center for Healthy Communities Campus.[33] The Restorative Justice Master Plan and Hope Village Project are intended to "tie together all nearby development," including other City and County partnerships.[34]

Based on publicly available information from KFA Architecture and Urbanize Los Angeles, Homeboy Industries intends a five-story 36,000 square-foot transitional housing building with 157 residential units at the southeast corner of Alameda and Alpine Streets on 903 North Main Street.[35, 36] According to KFA Architects' (the Homeboy Industries project's architect) website, the housing buildings would offer "support for the Homeboy population with dorm style apartments and supportive housing. The first phase

[31] Revised Motion by Supervisor Hilda L. Solis for Restorative Justice Village Master Plan (January 26, 2021), available at https://file.lacounty.gov/SDSInter/bos/supdocs/153341.pdf (accessed September 20, 2023).

[32] The Restorative Justice Master Plan and Hope Village Project are often described interchangeably, sharing common projects and goals. For instance, Homeboy Industries' architect KFA Architecture refers to the Homeboy Industries housing development project as "one component of a new 'Restorative Justice Village' planned for Chinatown," whereas Homeboy Industries' website describes this same project as the "Hope Village." (See KFA Los Angeles, Homeboy Industries Campus, https://kfalosangeles.com/project/homeboy-industries-campus (accessed September 20, 2023); Homeboy Industries, Campus Expansion and Transitional Housing, available at https://homeboyindustries.org/hiltonfoundation/initiatives (accessed September 20, 2023). Little detail as to the location and uses of the Restorative Justice Master Plan and Hope Village Project components are publicly available.

[33] Assemblywoman Wendy Carrillo, Assemblywoman Wendy Carrillo Announces $5 Million in California State Budget Funds for Hope Village Project (Nov. 1, 2022), https://a52.asmdc.org/press-releases/20221101-assemblywoman-wendy-carrillo-announces-5-million-california-state-budget (accessed September 20, 2023).

[34] Revised Motion by Supervisor Hilda L. Solis for Restorative Justice Village Master Plan (January 26, 2021), available at https://file.lacounty.gov/SDSInter/bos/supdocs/153341.pdf (accessed September 20, 2023).

[35] KFA Los Angeles, Homeboy Industries Campus, https://kfalosangeles.com/project/homeboy-industries-campus (accessed September 20, 2023).

[36] Urbanize Los Angeles, Homeboy Industries expands into affordable housing (Oct. 8, 2021), https://la.urbanize.city/post/homeboy-industries-expands-affordable-housing (accessed September 20, 2023).

will also provide stacked parking, a gym, a mechanic's garage and outdoor recreational space . . . The new housing and accompanying structures wrap around a site which also fronts the intersection of Main and Vignes Streets."[37] The housing would be located on 903 North Main Street.

While little detail as to the location and uses of the Restorative Justice Master Plan and Hope Village Project components was publicly available, the Draft EIR considered proposed development projects in the vicinity of the proposed Project, using public information to the extent it was available. Table 5-1: Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, lists 46 related land use development projects considered in the Draft EIR's analysis that are either approved or proposed, including Restorative Justice Master Plan and Hope Village projects, such as the interim housing facility at 1060 North Vignes Street (Related Project 34) and the 903 North Main Street proposed housing project (Related Project 43). The proposed Project would support the goals of the Restorative Justice Master Plan and Hope Village Project by offering an additional transit option in the area, enhancing connectivity in Downtown Los Angeles, by providing direct linkages to major residential, employment, and tourist destinations.

Accordingly, the Draft EIR considered and analyzed the proposed Project's consistency and potential impacts to all of the approved or proposed/anticipated housing projects along the proposed Project alignment, inclusive of the Restorative Justice Village Master Plan and Hope Village projects. Further, due to the minimal private property where aerial rights may be required for the proposed Project, other future housing or development projects may be similarly constructed.

The Project Does Not Impact Homeboy Industries' Housing Project

The proposed Project would not impair or impact either Homeboy Industries' current operations or their future housing development and expanded operations, or otherwise impact or impair Homeboy Industries' ability to deliver housing in response to the City and County's State of Emergency declarations regarding the homeless crisis. The proposed Alpine Tower is sited on 901 North Main Street and Homeboy Industries' housing project is located on 903 North Main Street.

In addition to the proposed Project's Alpine Tower not being physically located on the site of Homeboy Industries' anticipated housing project, the minimal aerial rights required for the proposed Project do not conflict with or impact the Homeboy Industries housing project.

The Alpine Tower's Location Considered and Avoided the 903 North Main Street Homeboy Housing Project

The Alpine Tower and Homebody Industries' housing project would be on separate parcels – the proposed location of the Alpine Tower is on 901 North Main Street, which is located across Alpine Street from the 903 North Main Street parcel where Homeboy Industries presumably intends to locate its anticipated housing project, as shown on the image below.

[37] KFA Los Angeles, Homeboy Industries Campus, https://kfalosangeles.com/project/homeboy-industries-campus (accessed September 20, 2023).

As discussed in Section 2.0, Project Description, of the Draft EIR, one of the proposed Project's objectives is to "maximize the use of ROW, and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses," and the proposed Project was designed in accordance with this objective. Further, as discussed on page 2-22 in Section 2.0, Project Description, of the Draft EIR, "[i]n the process of selecting tower locations, the proposed Project . . . considers the proposed Project's relationship to existing adjacent and potential future land uses."

The Project's Alpine Tower would have a footprint of approximately 1,030 square feet on the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold) on 901 North Main Street, as shown in Figure 2-14: Proposed Alpine Tower Location, in Section 2.0, Project Description, of the Draft EIR. This proposed tower is located across Alpine Street from Homeboy Industries' anticipated housing project on 903 North Main Street, as further depicted on the image above.

The Homeboy Industries Housing Project Was Considered a Related Project in the Draft EIR

Table 5-1: Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, lists Homeboy Industries' 157-dwelling unit anticipated housing development at 903 North Main Street as related project number 43. Figure 3.13-5: Noise Sensitive Receptors Map, in Section 3.13, Noise, of the Draft EIR, also lists Homeboy Industries' anticipated housing project as Noise Sensitive Receptor number 5, "Future Residential Development," and Vibration Sensitive Receptor number 11. Section 3.03, Air Quality, of the Draft EIR, and Appendix D, Air Quality/HRA Technical Report, of the Draft EIR, also identify Homeboy Industries' anticipated housing project as a sensitive receptor for the purposes of the Air Quality analysis and Health Risk Assessment. Accordingly, the Draft EIR considered Homeboy Industries' housing project in its analysis as one of the 46 related projects and as a sensitive receptor for the purposes of the air quality and noise and vibration analysis.

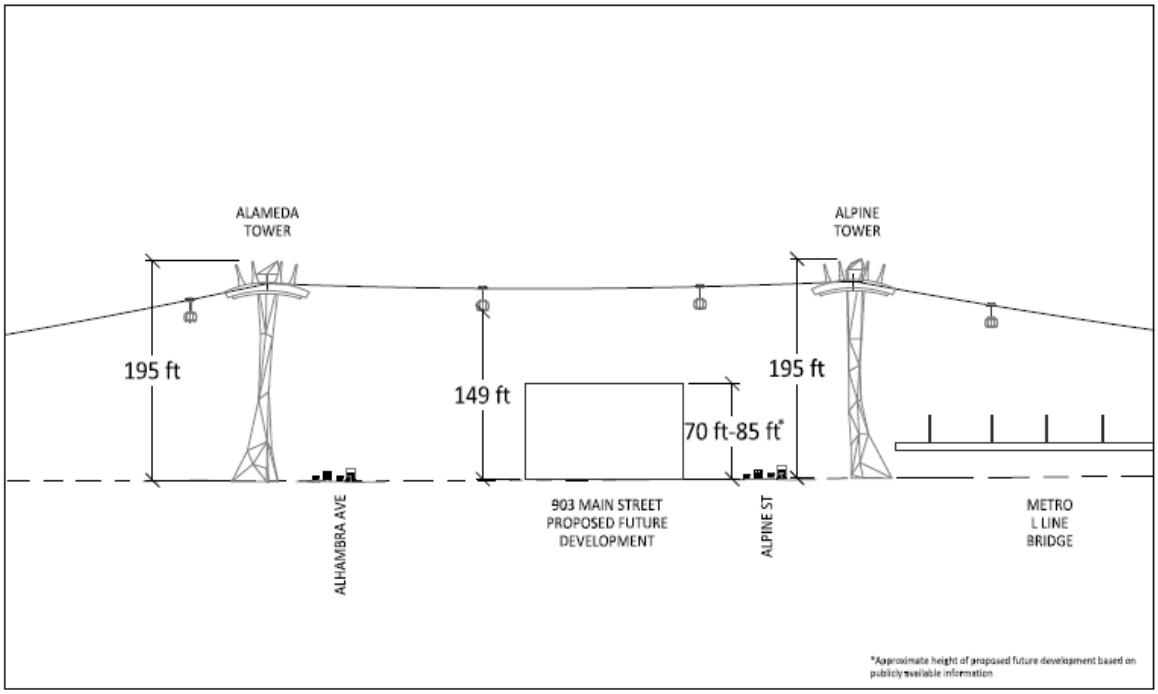
Aerial Rights Over 903 North Main Street

The proposed Project's minimal aerial rights requirement over 903 North Main Street would not interfere with Homeboy Industries' anticipated housing project.

As discussed in Section 2.4.6, Aerial Clearance, of the Draft EIR, the proposed Project will comply with industry standards for the design and operation of ropeways and cabins, including ANSI B77.1, regulating vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles, pedestrians, vegetation, buildings, and other structures. As shown in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the proposed Project would require certain aerial rights over the edge of the property, which could be occupied in the future by Homeboy Industries' anticipated housing project in order to meet the industry standard clearance requirement.

The following image was included in Appendix Q of the Draft EIR:

The proposed Project is anticipated to require approximately 700 square feet of ANSI required aerial rights over 903 North Main Street, plus an Additional Separation Buffer.[38] Based on the publicly available information, Homeboy Industries' anticipated housing project at this location would be five stories. Based on the publicly available renderings on KFA Architect's website, Homeboy Industries' housing project appears to be Type III or Type V construction over a podium and appears to be approximately 70 feet high, and would be unlikely to exceed approximately 85 feet, which is the typical maximum height for Type III or Type V construction. ANSI B77.1 requires a vertical clearance of at least five feet over buildings. The proposed Project was designed to ensure that this clearance is met, as the bottom of the cabins would be 149 feet above ground and the cable would be 170 feet above ground. Accordingly, there would not be a conflict between Homeboy Industries' anticipated housing project and the required aerial clearances for the proposed Project. The proposed Project would substantially exceed the required aerial clearances from Homeboy Industries' anticipated housing project and would not impact either its construction or operation. The following segment of the proposed alignment's profile between Alameda Tower and Alpine Tower illustrates the proposed Project's relationship to Homeboy Industries' anticipated housing project, significantly exceeding the required clearances based on the publicly available information regarding Homeboy Industries' housing project.



LA ART | Segment of Proposed Alignment Profile with Homeboy Industries' Proposed Future Development at 903 North Main Street
SCALE: 3/16":1' | 4/13/2023

Development of Housing Is Constrained on the Portion of 901 North Main Where Alpine Tower Is Located Due to the Proximity to the Metro L Line (Gold) Tracks

The proposed Alpine Tower would occupy approximately 1,030 square feet of 901 North Main Street on the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). The proposed Alpine Tower is located on a triangular portion of 901 North Main Street between the Metro L

[38] Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer.

Line (Gold) tracks and Alameda and Alpine Streets, this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing.[39] Based on publicly available information there is no housing proposed for this specific location, which is west of the Metro L Line (Gold) tracks on 901 North Main Street. The area east of the Metro L Line (Gold) tracks on 901 North Main Street would not be impacted by the proposed Alpine Tower.

The City of Los Angeles is currently in the process of transferring the City owned property at 901 and 903 North Main Street to Friends of Homeboy, LLC, on behalf of Homeboy Industries, pursuant to the City's Affordable Housing Opportunity Site program utilizing City owned properties that have been designated as surplus under the Surplus Land Act.[40] The City of Los Angeles' City Administrative Officer published a report on the proposed property transfer, determining that while 903 North Main Street was an appropriate site for affordable housing, "potential uses of [901 North Main Street] may be restricted to supplemental commercial uses related to affordable housing and services," due to the elevated Metro L Line (Gold) facilities. Specifically, the City recognized that the 901 North Main Street "site is bisected by overhead tracks, which are protected by an easement to" Metro and therefore "the Metro tracks will affect the ability to develop on the site."[41]

According to the City's Zone Information and Map Access System (ZIMAS), development and construction projects on 901 North Main Street must consult with Metro pursuant to Metro's Adjacent Development Review process to ensure safety and avoid conflicts related to transit services and operations. The process applies to work within 100 feet from Metro right-of-way, which affects most or all of the 901 North Main Street property.[42] Metro's Adjacent Development Handbook[43] requires that building appurtenances and landscaping must be a minimum of 10 feet from Metro's overhead catenary system and support structures. If a transmission power feeder cable is present, a 20-foot setback from the overhead catenary system and support structures is required.

Compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street. Metro's Adjacent Construction Design Manual[44] incorporates all Federal, State, and internal Metro requirements for adjacent construction. Under these requirements, Metro must review and approve each part of the project's design to determine the effect of the proposed project on the Metro existing structures and its transit operations. Similar to Metro's Adjacent Development Handbook, the Design Manual requires that "[a]ll developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at

[39] March 29, 2019, Letter from Richard H. Llewellyn, Jr., City Administrative Officer, to Los Angeles City Council regarding Recommendations for Proposed Transfer of 901 and 903 Main Street, Los Angeles, CA 90012, available at https://clkrep.lacity.org/onlinedocs/2018/18-0930_rpt_CAO_03-29-2019.pdf#page=3 (accessed September 20, 2023).

[40] Ibid.

[41] *Id*., pp. 2-3.

[42] The 903 North Main Street property is also located within this area, according to ZIMAS.

[43] Los Angeles County Metropolitan Transportation Authority, Metro Adjacent Development Handbook (2021), https://www.dropbox.com/s/3cddvf2og5jo5v6/2021-Adjacent-Development-Review-Handbook.pdf?dl=0 (accessed September 20, 2023).

[44] Los Angeles County Metropolitan Transportation Authority, Metro Design Criteria and Standards Adjacent Construction Design Manual (2018), https://www.dropbox.com/s/c02lklxuvphbah1/2018-Adjacent-Construction-Design-Manual.pdf?dl=0 (accessed September 20, 2023).

Metro or the developer's property for maintenance to be performed or installed from the zone created by this setback[]."[45]

These restrictions constrain the development potential for the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets where the Alpine Tower is proposed. Indeed, according to publicly available information,[46] Homeboy Industries is not proposing housing on 901 North Main Street. Homeboy Industries would still be able to develop the remainder of the 901 North Main Street property to the east of the Metro L Line (Gold) tracks with commercial and related uses to support its anticipated housing project and services at 903 North Main Street.

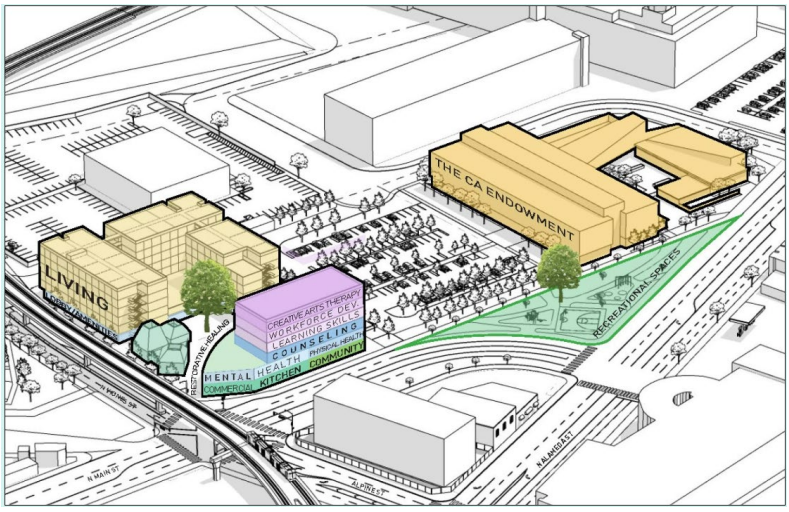
The Alpine Tower supports zero-emission transit in an area where approximately 25 percent of the residents utilize either public transportation or walking for commuting to work. This additional transit option would benefit existing and future residents in the proposed Project area. Moreover, the Project Sponsor has reached out to Homeboy Industries to express its desire to collaborate with Homeboy Industries to support Homeboy's housing project, such as the potential to provide a symbiotic use at the base of the Alpine Tower, including potential Homeboy Industries signage, shade structures, seating, hardscape and landscape enhancements and other pedestrian enhancements.

The Proposed Project Does Not Impede The California Endowment's Anticipated Hope Village Project

Subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023[47] with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents.

A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as "RECREATIONAL SPACES."

The following graphic from the Annual Report 2023 depicts the recreational spaces.



[45] Ibid.

[46] See, e.g., KFA Los Angeles, Homeboy Industries Campus, https://kfalosangeles.com/project/homeboy-industries-campus (accessed September 20, 2023).

[47] The California Endowment, Annual Report 2023 (2023), https://www.calendow.org/annual-report (accessed September 20, 2023).

As detailed in Section 2.0, Project Description, of the Draft EIR, the proposed Project proposes to locate the Alameda Tower in the northwest corner of the Alameda Triangle. The Alameda Tower base would be 900 square feet. Refer to Figure 2-12: Proposed Alameda Tower Location, of the Draft EIR, for the location of the Alameda Tower. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

The proposed Project would not impair or impact The California Endowment's potential use of the Alameda Triangle for recreational spaces. As noted, the Alameda Tower base would be located in 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic depicts the Alameda Triangle, including space for both the Alameda Tower and potential recreational spaces based on the graphic in the Annual Report 2023.

The proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces.

Further, the proposed Project alignment travels along Alameda Street, and, as shown in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, does not require any aerial rights over the properties that The California Endowment anticipates building its housing or community and health services. Accordingly, the proposed Project would not impede The California Endowment's anticipated housing, community and health services, or recreational spaces, based on the available information.

Pursuant to CEQA Guidelines sections 15125 and 15130, the Draft EIR should consider conditions as they exist at the time the notice of preparation is published, and include a cumulative impacts analysis of past, present, and probable future projects. The notice of preparation for the proposed Project was published

on October 1, 2020. As of October 2023, The California Endowment has yet to file an application for the anticipated Hope Village project, and therefore the project need not be treated as a present or probable future project for the purposes of environmental review. Further, The California Endowment has not publicly released any further details other than those outlined above in its Annual Report 2023. CEQA does not require speculation as to potential related impacts, and therefore no additional analysis is required.[48]) Any potential impacts regarding proximity of the proposed Project have been addressed with respect to the adjacent The California Endowment building, which was included as a sensitive receptor for the purposes of the Draft EIR's analysis. The proposed housing and community services are located further away from the Alameda Tower site than The California Endowment, so potential impacts are expected to be less.

Surplus Land Act

Comments regarding the Surplus Land Act do not raise substantive issues on the content of the Draft EIR and therefore no response is warranted pursuant to CEQA. Regardless, the proposed Project will comply with all State laws, including the Surplus Land Act.[49]

The Surplus Land Act requires local agencies to declare land as either "surplus land" or "exempt surplus land," as supported by written findings before the local agency may take any action to dispose of the land consistent with an agency's policies or procedures.[50] The SLA and related Guidelines published by the California Department of Housing and Community Development (HCD) [51] set forth procedures applicable to the disposition of surplus land or exempt surplus land.

Metro and the City will exercise their independent judgment regarding the disposing of any Metro or City-owned land that may be necessary for the proposed Project, which may require compliance with the Surplus Land Act, and will act in conformance with the law, including seeking guidance from HCD as reasonably necessary to ensure compliance with the SLA.[52] Compliance with the Surplus Land Act, should it apply, is separate and distinct from the CEQA environmental process and the purpose of environmental review.

Gentrification and Displacement

The proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Metro recognizes that gentrification is "a process of neighborhood change in a historically disinvested neighborhood . . . by means of real estate investment," including the "changes that happen when new, higher-income residents move in," including potential displacement of existing residents.[53] As discussed in Section 3.14, Population and Housing, of the Draft EIR, no displacement of existing residences or housing would occur in connection with construction or operation of the proposed Project, which

[48] CEQA Guidelines Section 15145.
[49] California Government Code. 2009. Section 54220 et seq.
[50] California Govnment Code. 2009. Section 54221(b)(1).
[51] https://www.hcd.ca.gov/community-development/docs/sla guidelines final.pdf.
[52] As noted above, the City owned property where Alpine Tower would be located has already been deemed surplus and is in the process of being transferred to Friends of Homeboy, LLC, on behalf of Homeboy Industries, pursuant to the City's Affordable Housing Opportunity Site program.
[53] https://www.metro.net/about/gentrification-displacement/.

would operate primarily over the public ROW. Further, the proposed Project does not include any new housing and is a first-mile/last transit connection to Dodger Stadium for existing residents, workers, park users, and visitors to Los Angeles.

As discussed in Section 3.14, Population and Housing, of the Draft EIR, the proposed Project would increase connectivity in downtown Los Angeles by providing direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. The Project Study Area includes a population of which approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. The proposed Project would enhance community connectivity for existing residents by providing direct linkages to major residential, employment, and tourist destinations, including to the second largest public parks and recreation area in Los Angeles—Elysian Park. Further, the proposed Project is located adjacent to existing transit stops at LAUS and the Metro L Line (Gold) Chinatown Station; any gentrification due to the construction of a transit facility would have already resulted due to these existing transit options. No gentrification or displacement would result from the construction of Dodger Stadium Station, which would be located on the Dodger Stadium property in a portion of the existing parking lot for the Stadium.

Consistent with Metro's plans regarding gentrification and displacement, the proposed Project would "support and strengthen opportunities for small and local businesses, and preserve and enhance communities' cultural assets." The proposed Project's partnerships and benefits to local businesses and opportunities to showcase local artists, as well as the immediate neighborhood culture's influence on the proposed Project's design is discussed in Topical Response C, Project Features.

The Project Will Not Take Funding from Housing Projects

Commenters suggest that funding for the proposed Project will be diverted from funding for housing projects. Section 4.0, Costs and Financing, of this Final EIR, discusses potential funding for the proposed Project. No funding benchmarked for housing projects or development will be used to fund or finance the proposed Project.

TOPICAL RESPONSE F
Los Angeles State Historic Park

Comments on the Draft EIR suggest California Department of Parks and Recreation's ("State Parks") does not have the authority to grant the necessary approvals for the proposed Project's use of Los Angeles State Historic Park ("LASHP" or "Park"). As detailed in this topical response, State Parks has the authority to grant the necessary approvals for the proposed Project. State Parks will undertake its own review of the proposed Project when the Project Sponsor seeks approvals for its use of LASHP from State Parks.

Because comments regarding State Parks' authority to grant the necessary approvals for the proposed Project's use of LASHP do not raise substantive issues on the content of the Draft EIR, no further response is required by CEQA. Nevertheless, this topical response provides information regarding State Parks' authority to grant the necessary approvals for the proposed Project's use of LASHP.

California Department of Parks and Recreation's Authority to Permit Project

State Parks Has Authority to Grant Project Approvals

As discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, approvals determined necessary by State Parks for the proposed Project's use of LASHP could include, but are not necessarily limited to:

a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.

b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.

c. Pursuant to Public Resources Code section 5003 and Government Code section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.

d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

Title to real property owned by State Parks is vested in the name of the State of California.

State Parks' transfer of real property interests through lease or easement requires the review and approval of Department of General Services ("DGS") per Government Code section 11005.2.[54]

Right-of-Entry Permits

Under State Parks' general authority, State Parks "may establish rules and regulations not inconsistent with law for the government and administration of the property under its jurisdiction. The department may expend all moneys of the department, from whatever source derived, for the care, protection, supervision, extension, and improvement or development of the property under its jurisdiction."[55] Within this authority, State Parks can issue Right-of-Entry Permits.

[54] California Government Code. 2019. Section 11005.2.
[55] California Public Resources Code.1983. Section 5003.

Right-of-Entry Permits, issued at the District level and reviewed by State Parks' Acquisition and Real Property Services Division, are for a short-duration use of state park property. A Right-of-Entry Permit is a revocable, short-term permit. Therefore, they are not considered an encumbrance in the same way as an easement or lease.

Leases and Easements

Other real property transactions such as the granting of an easement to a private party not performing a public service or entering into leases for any use may be carried out by DGS, as applicable, on behalf of State Parks with State Parks' approval, if the transactions meet certain statutory requirements.

Public Resources Code section 5003.17 authorizes and provides, among other things, that State Parks may lease for a term not exceeding ten years, for any use at fair market value, all or a portion of any parcel of the State Park System if the State Parks Director finds that the use would be compatible with the use of the real property as a unit and with the sound management and conservation of resources within the unit. Leases beyond ten years are allowed if the proposed lease is provided to the Joint Legislative Budget Committee along with "sufficient documentation to enable the joint legislative budget committee to determine whether the lease conforms to the requirements of [state law] and to evaluate fully all terms upon which the lease is proposed to be let, including the amount of the rent and other revenues that may be generated under the lease."[56] () Thus, prior to entering into a lease for the proposed Project, the State Park Director would ensure that the proposed Project pays fair market value[57] and that the use is compatible with (1) the use of LASHP as a unit and (2) the sound management and conservation of resources within LASHP.

State law provides two provisions related to easements on State Parks property: Public Resources Code section 5012 and Government Code section 14666. Only Government Code section 14666 is potentially applicable to the proposed Project.

Commenters assert that Public Resources Code section 5012 precludes State Parks from issuing the required approvals. Section 5012 authorizes State Parks to grant permits and easements to public agencies for utilities and public roads and to grant other utility easements or to perform a public service, upon application by the proper authorities. However, as the private Project Sponsor is not a public agency, this provision is not applicable.

Instead, real property transactions such as a sale of property, granting of an easement, or an acquisition of real property may be carried out by DGS on behalf of the State Parks with State Parks' approval, if the transactions meet statutory requirements.

Government Code section 14666 states: "With the approval of the state agency concerned, the [DGS] director may grant and convey in the name of the state, easements and rights-of-way across real property belonging to the state not used for highway rights-of-way or high-speed rail rights-of-way, for those purposes and upon that consideration and subject to those conditions, limitations, restrictions, and reservations as the director deems are in the interest of the state."[58] Thus, with the approval of State

[56] California Public Resources Code. 2017. Section 5003.17(d).

[57] Paying fair market value would ensure that the proposed Project does not receive a "gift" from the State or any of its political subdivisions in compliance with Article XVI, Section 6 of the California Constitution.

[58] California Government Code. 2014. Section 14666.

Parks, the DGS director may grant required easements and rights-of-way across LASHP for the proposed Project.

State Parks' Considerations When Granting Approvals

Commenters raise several provisions of the Public Resources Code that provide directives to State Parks on how it should manage the State Park System.[59] State Parks will assess the proposed Project against its statutory authorities when the Project Sponsor seeks its approvals for use of LASHP from State Parks in the future. That said, as discussed in the Section 3.16, Parks and Recreational Facilities, and Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project would be consistent with the goals and guidelines of the LASHP General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation.

Section 5001 is the Legislative findings section of the Public Resources Code regarding the State Park System. It provides the broad declaration that state parks "deserve to be preserved and managed for the benefit and inspiration of all state residents and visitors to the state parks."[60] As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project is consistent with this goal by providing enhanced access and facilities so that even more residents and visitors can enjoy LASHP. As discussed in Table 3.11-1, Project Consistency with Applicable Los Angeles State Historic Park General Plan Policies, in the Draft EIR, the proposed Project

> would provide a connection from the Los Angeles State Historic Park to other local transit lines along the proposed Project alignment and the regional transit system accessible at [Los Angeles Union Station]. Specifically, the Chinatown/State Park Station would provide transit access to the Los Angeles State Historic Park and to nearby neighborhoods and land uses, including Chinatown, Elysian Park, Solano Canyon, and the Mission Junction neighborhood, which includes the William Mead Homes public housing complex, and the Los Angeles River. The Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program.

Public Resources Code section 5001.2 states that "[t]he director shall promote and regulate the use of the state park system in a manner that conserves the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations."[61] As discussed in Section 3.01, Aesthetics, Section 3.04, Biological Resources, and Section 3.05 Cultural Resources, of the Draft EIR, there are no significant and unavoidable impacts to aesthetics, biological resources, or cultural resources, related to the proposed Project's use of the LASHP and the proposed Project will enhance the enjoyment of LASHP by providing increased access and visitor use facilities. See also Appendix H.2, Supplemental KOPs in Response to Comments, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, and Appendix C, Visual Impact Assessment, Appendix E, Biological Resources Assessment, Appendix F, Archaeological and Paleontological Resources Assessment, and Appendix G, Historical Resources Technical Report, of the Draft EIR.

[59] See, e.g., California Public Resources Code Sections 5001, 5001.2, 5019.53, and 5019.59.
[60] California Public Resources Code. 2016. Section 5001.
[61] California Public Resources Code. 2016. Section 5001.2.

As discussed in Section 3.11.3, Land Use and Planning, of the Draft EIR, Public Resources Code section 5019.59 permits facilities in historical units of the State Park system related to the safety, comfort, and enjoyment of the visitors, "such as access, parking, water, sanitation, interpretation, and picnicking."[62] The use of the term "such as" denotes that the list of allowable facilities is not exhaustive. But, in any event, it explicitly provides that facilities related to access are those types of facilities that are permitted. Commenters opine on the use of the word "required" in section 5019.59, arguing that because the proposed Project is not "required" to provide access, it is not an allowable use. However, the plain text of the section makes clear that the word "required" is describing the general types of uses that are allowed, such as access, and not describing every individual facility. If read as the commenters suggest, then no facilities would ever be allowed because no individual facility is "required." Nothing in section 5019.59 would prohibit State Parks from issuing the necessary approvals for the proposed Project.

Section 5019.53 states that "[i]mprovements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations."[63] The proposed Project will enhance LASHP by providing greater access, providing approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms, providing a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access improvements could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating. These improvements could help to bring awareness of LASHP to thousands of people each year. Nothing in section 5019.53 would prohibit State Parks from issuing the necessary approvals for the proposed Project.

Provisions Cited By Commenters Allegedly Prohibiting State Parks From Granting Approvals Are Not Applicable

Commenters suggest certain other provisions of the Public Resources Code prohibit State Parks from granting the necessary approvals for the proposed Project's use of LASHP. Commenters misconstrue those provisions of law.

Public Resources Code section 5003.5 provides State Parks with authority to "provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public and to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks. . . ."[64] As a threshold matter, the proposed Project is not seeking to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks. Thus, State Parks does not need to "determine whether any reasonable access exists outside the boundaries of the park, or could be economically constructed." Indeed, the only provision of Public Resources Code section 5003.5 that arguably applies to the proposed Project is the general authority provided to State Parks to "provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public." Because the proposed Project will

[62] California Public Resources Code. 2001. Section 5019.59.
[63] California Public Resources Code. 2001. Section 5019.53.
[64] California Public Resources Code. 1959. Section 5003.5.

be providing a means of ingress to and egress from LASHP, section 5003.5 allows State Parks to authorize the proposed Project.

As discussed above, Public Resources Code section 5012 is also inapplicable to the proposed Project. Section 5012 permits State Parks to grant easements and permits for certain public utility and other public uses (e.g., roads, bicycle and pedestrian trails, etc.). However, this section does not prohibit other authorized types of easements, permits, and leases that are expressly permitted by other statutory grants as discussed above.

Commenters assert that the prohibition in Public Resources Code section 5001.65 on "commercial exploitation of resources in units of the state park system" categorically prohibits State Parks from issuing the required approvals for the proposed Project. This reading of section 5001.65 is incorrect. The State Legislature did not define "commercial exploitation" in section 5001.65, but the exceptions noted therein for oil or gas directional drilling, commercial fishing, taking of mineral specimens for recreational purposes from state beaches, state recreation areas, or state vehicular recreation areas indicate examples of commercial exploitation. Unlike some commenters' assertion that section 5001.65 acts as a prohibition on all commercial *use* of the state park system, it is clear that the Legislature was focused on the commercial exploitation of tangible resources like minerals and biological resources that can be extracted from certain state lands.

Commenters' broad reading of section 5001.65 would render moot various State Parks laws and regulations that explicitly allow commercial uses of the state park system with permits.[65] Indeed, commenters' interpretation would prohibit the many commercial events (e.g., music festivals and farmers markets) that regularly occur at LASHP each year. (See, e.g., Draft EIR, § 5.5.2, Special Events at the Los Angeles State Historic Park [noting the LASHP hosts large events with up to 25,000 people and smaller monthly events of 500 to 5,000 people, including concerts, movie screenings, and festivals].)

As one commenter correctly notes, the Public Park Preservation Act is not applicable to the approvals that the proposed Project will seek from State Parks. The Public Park Preservation Act requires public entities which are acquiring public parkland to pay or transfer to the legislative body operating the park sufficient compensation or land to replace the park land that is being acquired. The Project Sponsor, which is not a public entity, is not seeking to "acquire" any real property that is public parkland for the proposed Project. Instead, the Project Sponsor is seeking land use approvals from State Parks to permit the proposed Project to use a portion of LASHP. Thus, the Public Park Preservation Act does not impose any requirements on the proposed Project and, as such, does not provide any informational value.

LASHP General Plan Amendment

As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the LASHP General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect.

[65] See, e.g., California Public Resources Code Section 5080.03 [permitting State Parks to enter concessions contracts with corporations] and 14 Cal. Code Regs. § 4316 [allowing commercial filming with a permit].

State Parks has determined that the proposed Project would be inconsistent with the LASHP General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan ("LASHP General Plan Amendment"). The LASHP General Plan Amendment proposes to amend the Preferred Park Concept Elements to include a "Transit" land use to allow for the proposed Project's use, as well as to address the state historic park classification as defined in Public Resources Code section 5019.59, which permits facilities for the comfort and enjoyment of the visitors, such as access. No other inconsistencies with LASHP General Plan policies were identified during the analysis, and therefore no other mitigation measures are required.

The LASHP General Plan Amendment, including any actions to address the state historic park classification as defined in Public Resources Code section 5019.59, is subject to the review and approval by the State Park and Recreation Commission, which retains its independent authority related to the proposed Project under Public Resources Code section 21174. Because the EIR analyzes all direct and indirect physical impacts to the environment associated with the permits and approvals outlined in Section 2.10, Required Permits and Approvals, of the Draft EIR, including the LASHP General Plan Amendment, the State Park and Recreation Commission will be able to rely on the EIR to support its discretionary action as a Responsible Agency pursuant to CEQA.

Consistency with the Transportation Theme of the Park

Metro and the Project Sponsor acknowledge the decades of planning and organizing that the community undertook to create a world-class park in the center of Los Angeles. This planning resulted in "a strong consensus around a vision for the Cornfield site incorporating four central themes: cultural-historical, including the role of water in the development of the region; connectivity; recreation; and transportation."[66]

The LASHP General Plan identifies transportation as a "primary theme" of the park, recognizing the site's long history of transportation uses. The General Plan states: "The movement of people and products has enabled Los Angeles to become the megalopolis it is today. The Park site has been a route of transportation and commerce throughout its history. Located within bustling transportation and river corridors, the Park provides a place to reflect on the commercial and industrial activities that have shaped the city."[67]

This transportation theme has been central to LASHP planning. The Cornfield State Park Advisory Committee was directed by Senate Bill 1177 to prioritize a list of recommendations for both interim and permanent land uses and facilities at the LASHP site. In April 2003, the Advisory Committee presented a recommendations report, "A Unified Vision for Cornfield State Park," to the State Parks Director, outlining a long-term vision and essential themes for park development, which included transportation.

[66] Cornfield State Park Advisory Committee. 2003. Recommendations Report. Available at: https://www.parks.ca.gov/pages/21491/files/RecommendationsReport.pdf (accessed August 2023).

[67] California State Department of Parks and Recreation 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf (accessed September 2023).

The Unified Vision for Cornfield State Park discussed the importance of transportation as a key theme of the park and how State Parks could incorporate this history into its planning for LASHP:

> Transportation has long been prominently associated with the Cornfield site, from the railroads and trolleys in the recent past to the Gold Line currently under construction and the freeways that criss-cross the neighboring communities. ***Design could both recognize this history and embrace environmentally-friendly transportation systems within the Cornfield, its adjacent communities and all nearby cultural and recreational points of interest.***
>
> Because pedestrian access has some limitations, shuttle buses, historic trolleys, and bike paths as well as walking paths should provide the basis for a "heritage trail" connecting other park or destination sites. The park could address the unique historical transportation linkages of the site through use, for example, of the rail cars from the age of steam and diesel at Traveltown, which would move back and forth as a linkage between the parks.
>
> To address the traffic calming issue, park planning should also recognize safe passages to surrounding communities and pedestrian linkages, particularly in routing the commuter bikeway from the Valley into Union Station. ***Transportation within the park, whether pedestrian, equestrian, bicycle, transit, parking or national historical trails, should link up with systems outside the park.*** Transportation systems must be integral to park and recreation uses and designed in a manner consistent with retaining, to the maximum extent possible, land available for other park purposes.[68]

Thus, while a transit use is not included in the Preferred Park Concept of the General Plan, "environmentally-friendly transportation systems within" the park that "link up with systems outside the park," are consistent with the Park's planning documents.

In summarizing the Park's "unit classification," the LASHP General Plan states:

> This park's historical significance transcends its historic uses and existing resources and is also linked to its role at the origin of Los Angeles' meteoric rise from remote frontier community to 21st Century urban megalopolis and international economic power. Its association with the first public works project (*zanja madre*) and early agriculture, its donation to the Southern Pacific Railroad as enticement to bring the transcontinental link to Los Angeles in the 1870s, and its role as a pioneer and catalyst for the City and region's unprecedented commercial, industrial, and social growth make it a unique place for tracing Los Angeles' cultural history from its origins to today.[69]

As a safe, zero emissions, environmentally-friendly, and high-capacity transit option which operates daily to link the Dodger Stadium property, Elysian Park, and the neighborhoods along the proposed alignment to the region's rapidly growing regional transit system at LAUS, the proposed Project advances this

[68] Cornfield State Park Advisory Committee. 2003. Recommendations Report. Available at: https://www.parks.ca.gov/pages/21491/files/RecommendationsReport.pdf (accessed August 2023).

[69] California State Department of Parks and Recreation 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf (accessed September 2023).

historical transportation theme while simultaneously providing the community a 21st century transportation option. In addition, the Chinatown/State Park Station would also include passenger amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. The Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. Refer to Topical Response C, Project Features, for a discussion of the proposed Project's features to enhance and provide additional benefits to LASHP and the surrounding communities.

Additionally, to honor and connect to the Park's history even further, the Project Sponsor has committed to work with State Parks to develop an "Interpretation Plan" to identify unique ways to use the proposed Project to provide additional interpretation at the park, particularly aimed at a diverse visitor community. The Interpretation Plan would be a strategic document that outlines the key elements required to design and implement interpretation programs associated with the proposed Project. The goal of this plan is to develop a program that will provide all visitors with an engaging and informative experience that will enhance their understanding and appreciation of LASHP's culture and history. The Interpretation Plan will include a detailed description of the history and significance of LASHP and will assess the existing interpretive resources within the Park. Based on this analysis, the Interpretation Plan will outline the overarching goals and objectives of the interpretation program, as well as the key themes and messages that will be conveyed to visitors.

The Interpretation Plan would also include a detailed description of the interpretive media and methods that will be used to deliver these messages effectively. This may include signage, exhibits, audiovisual presentations, guided tours, and other interactive experiences.

Overall, the Interpretation Plan will help ensure that the proposed Project is a benefit to LASHP by providing visitors with an engaging and informative experience that deepens their understanding and appreciation of LASHP's culture and history with regard to the history of transportation within and around Los Angeles. And while the proposed Project deepens the Park's connection to its transportation theme, it has been designed to avoid impacts to the other themes—recreation, cultural-historic, and connectivity—by careful siting and collaboration with State Parks. The Park will remain a green space to gather for small (family picnics and quiet walks) and large functions (community programming and festivals) alike.

LASHP General Plan EIR Mitigation Measure

Some commenters claim that the proposed Project is "disregarding" or "modifying" an adopted mitigation measure in the LASHP General Plan EIR. The referenced mitigation measure (Aes-1) requires State Parks

to review potential aesthetic quality impacts associated with new facilities and implement design practices that reduce those facilities' overall negative aesthetic effect.

The proposed Project does not "disregard" or "modify" this mitigation measure, which applies to State Parks' actions and does not apply to the proposed Project.

But, in any event, the Project Sponsor has been working cooperatively with State Parks to avoid or minimize impacts, including aesthetic impacts to LASHP, thus helping State Parks meet its obligations pursuant to this mitigation measure.

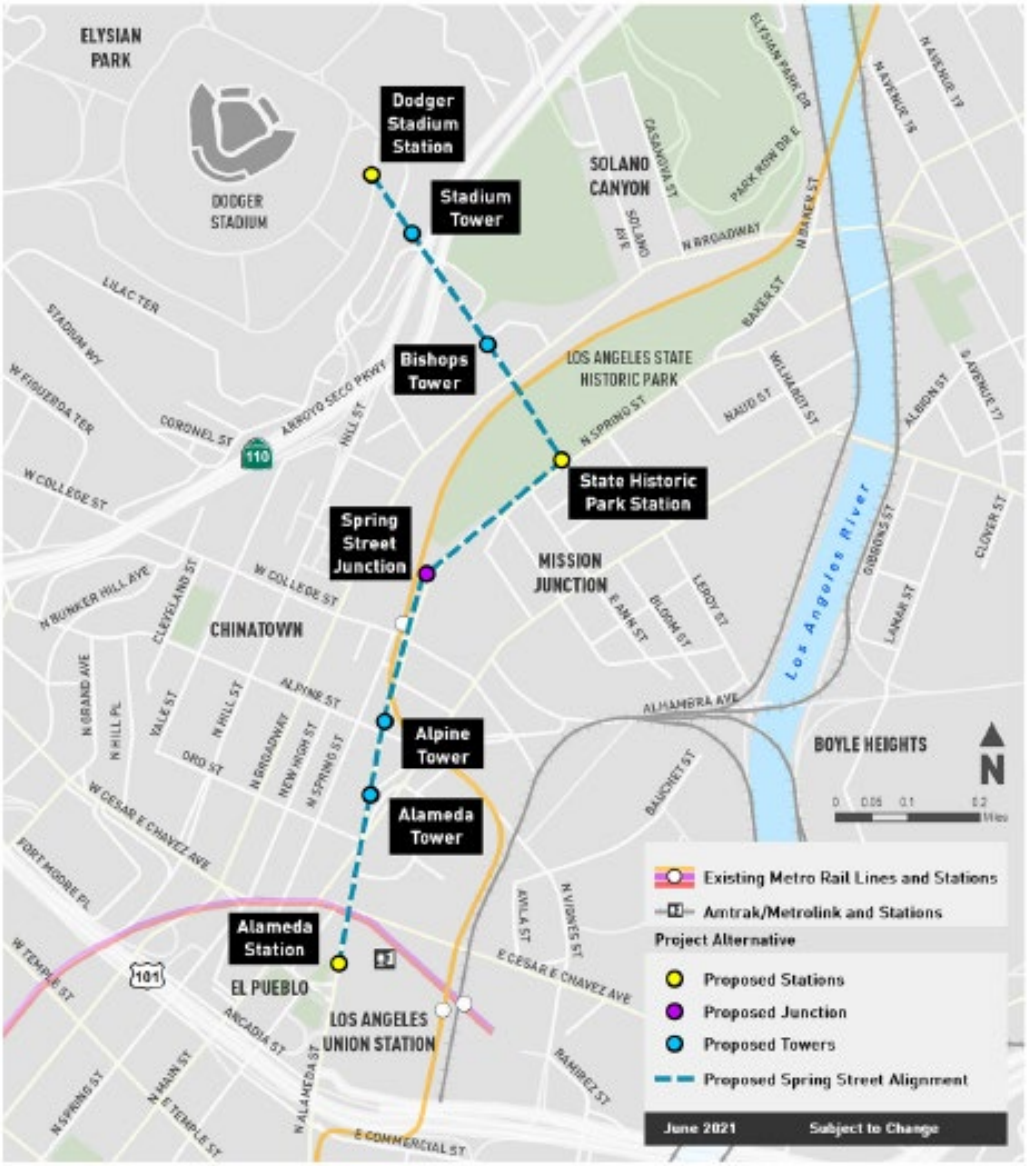
Indeed, in response to LASHP stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, the following design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on LASHP:

- Unlike the Spring Street Alignment Alternative, studied in Section 4.0, Alternatives, of the Draft EIR, where cables and cabins associated with the proposed Project would be visible over the middle of the Park, the proposed Project alignment crosses over the westernmost edge of the LASHP, parallel to an existing access road and overhead utility lines on North Broadway, and adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system to reduce visual and operational impacts to LASHP.[70]
- Also, unlike the Spring Street Alignment Alternative, where there would be a station in the middle of LASHP, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. The southern portion of the station would be located on City ROW, while the northern portion of the station would be integrated into the southern boundary of the Los Angeles State Historic Park. Any impacted trees will be relocated or replaced in coordination with State Parks. The location of the Chinatown/State Park Station also avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the LASHP, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway.
- The Project Sponsor worked with State Parks to select the site for the Chinatown/State Park Station to improve and balance pedestrian flow into the park, and to determine what other improvements would further enhance the visitor experience.
- To soften the visual effect of the Chinatown/State Park Station on LASHP, the size and scale of the station were reduced.
- The Draft EIR provides support for the future Los Angeles State Historic Park pedestrian bridge, the potential for which was analyzed in the LASHP General Plan and Final EIR. While the pedestrian bridge is not proposed as part of the proposed Project, the Draft EIR includes an

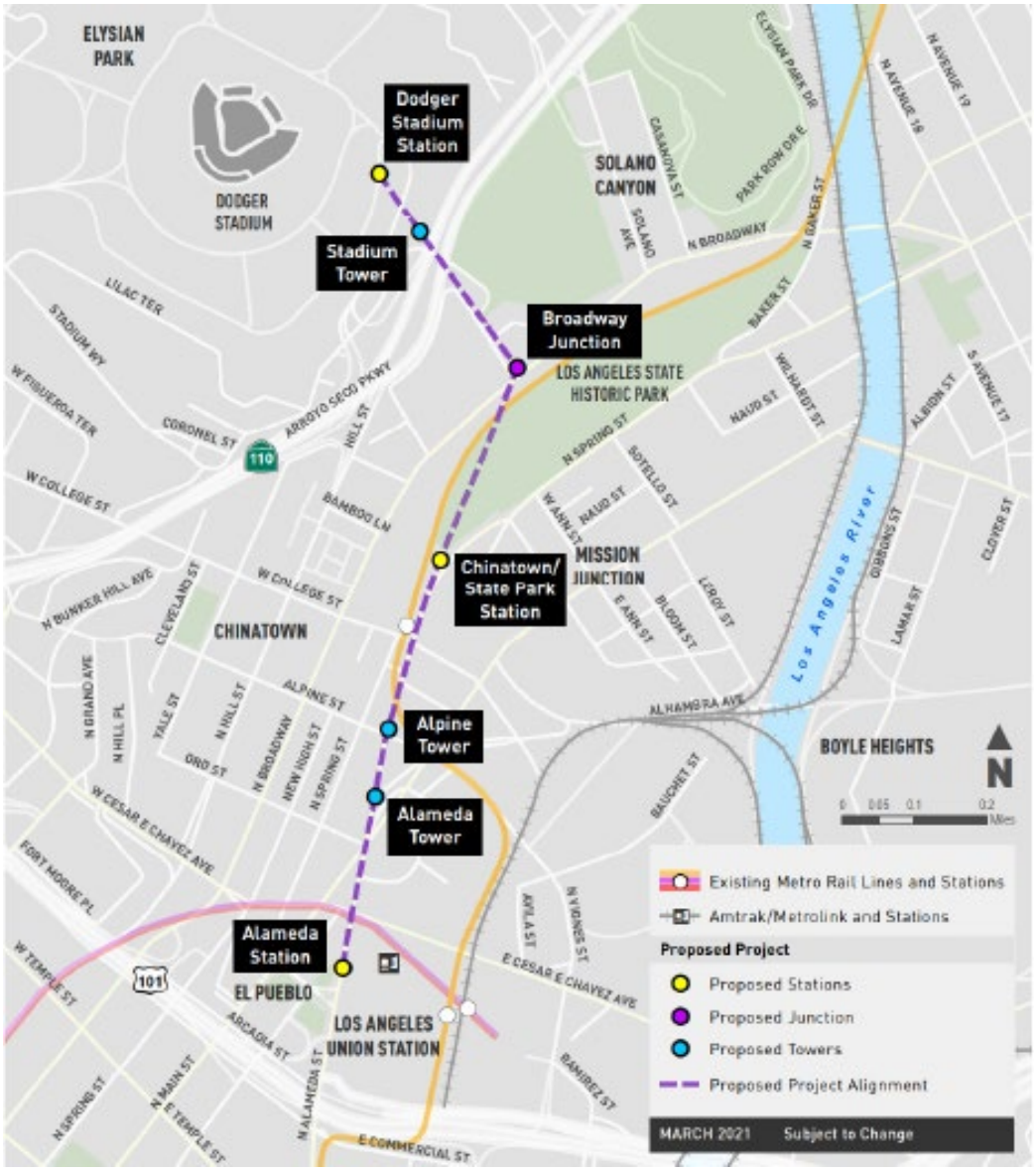
[70] The Notice of Preparation ("NOP") for the proposed Project included two alternative alignments, for providing transit service adjacent to (the Broadway Alternative), and flying over (the Spring Street Alternative) the LASHP. Several comments on the NOP requested an intermediate station closer to Chinatown to bring business into the commercial area and to offer another travel mode choice so as to alleviate parking problems in the area, rather than the intermediate station proposed under the Broadway Alternative (now the "Broadway Station Alignment Alternative"). And a majority of commenters expressed a preference for the proposed Project alignment over the Spring Street Alternative (now the "Spring Street Alignment Alternative"), to avoid flying over the middle of the LASHP. (See Appendix A, Scoping Report, of the Draft EIR, Attachment F, for copies of written comments submitted during the public scoping period, and a verbatim transcript of comments received during the scoping meeting).

analysis of the pedestrian bridge for the LASHP as Design and Use Option E. The pedestrian bridge could provide much needed access to LASHP for neighborhoods at the park's northern boundary.

- Project lighting would include low-level lighting for security and wayfinding purposes. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable Los Angeles Municipal Code lighting standards.
- Chinatown/State Park station would include the installation of landscaping and hardscaping, including integration of, rather than removing, the existing historic granite pavers into the design.
- All utilities for the proposed Project will be underground.



Spring Street Alignment Alternative



Proposed Project Alignment

The proposed Project's aesthetic impacts were evaluated in Section 3.01, Aesthetics, of the Draft EIR, supported by a comprehensive Visual Impact Assessment included in Appendix C of the Draft EIR. The Aesthetics Section of the Draft EIR and Visual Impact Assessment each specifically addressed and disclosed potential impacts on existing viewsheds and changes in the visual environment from within the LASHP. The Draft EIR concluded that the proposed Project would result in less than significant impacts to aesthetics and visual resources.

TOPICAL RESPONSE G
No Improper Project Segmentation: The Proposed Project is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property

Comments on the Draft EIR suggest that the proposed Project was improperly segmented or "piecemealed" from a larger development project at the Dodger Stadium property. The purpose of the proposed Project is to create a permanent transit connection from the region's transportation hub at Los Angeles Union Station ("LAUS") to the Dodger Stadium property via an aerial gondola system. The City of Los Angeles has approved the Dodger Stadium property only for the Major League Baseball stadium and ancillary uses and structures as set forth in the Conditional Use Permit ("CUP") for the Dodger Stadium property, including transit, and no other purposes. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project -- the first permanent transit connection to one of the region's most visited venues – has been well established.

The Proposed Project Addresses the Need for a Permanent Transit Connection to Dodger Stadium for Dodger Games and Special Events at the Dodger Stadium Property

As described in Section 2.0, Project Description, of the Draft EIR, the proposed Project would connect LAUS, the region's transportation hub, to the Dodger Stadium property via an aerial gondola system. The construction on the Dodger Stadium property for the proposed Project is limited to project components and related improvements, such as pedestrian circulation facilities, proposed in connection with the aerial gondola system. The proposed Project would provide the first permanent transit link to Dodger Stadium.

As discussed in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium is one of the region's most visited venues; the average attendance at a Dodger game was approximately 49,000 for the 2019 season. The vast majority of visitors drive their personal vehicles to access the venue. As the third oldest continually used ballpark in Major League Baseball, Dodger Stadium has hosted more than 147 million fans since its opening in 1962. In 2022, over 3.7 million visitors attended Dodger games. Annual attendance has surpassed 3 million visitors in 9 of the last 11 years (excluding 2020 and 2021 where attendance was limited due to the pandemic).[71] Dodger Stadium is the largest MLB stadium in terms of capacity, with approximately 56,000 seats. In addition to MLB games, other special events are hosted at Dodger Stadium throughout the year. As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium is one of the region's most visited venues, with approximately 100 baseball games and other events each year. However, there are no permanent transit connections to the venue. Other high-capacity venues in the region are directly accessible by public transit.[72] As such, the proposed Project addresses the increased need for Dodger Stadium to obtain a

[71] See Dodger Blue, Dodgers Attendance During 2022 Extended MLB Leading Streak (Oct. 7, 2022), https://dodgerblue.com/dodgers-attendance-during-2022-season-extended-mlb-leading-streak/2022/10/07 (accessed September 20, 2023).

[72] As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, other high-capacity venues in the region include the Crypto.com Arena, which hosts the Los Angeles Lakers and Los Angeles Clippers professional basketball teams and Los Angeles Kings professional hockey team; the Los Angeles Memorial Coliseum, which hosted the Los Angeles Rams professional football team between 2016 and 2019 and hosts the University of Southern California collegiate athletic events; and the BMO Stadium, home to the

permanent transit connection. Given the capacity of the system, approximately 20 percent of fans attending a Dodger game could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition, the proposed Project would provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

Accordingly, the proposed Project has a clearly defined transportation purpose and independent utility through its ability to address a regional need to provide a permanent transit connection to Dodger Stadium, while also providing new connections to neighborhoods along the proposed alignment to the region's rapidly growing regional transit system.

Overview of Improper Segmentation of a Project Under CEQA

CEQA requires a public agency to consider "the effects, both individual and collective, of all activities involved in a project."[73] The CEQA Guidelines explain that "project" refers to the "whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect change in the environment."[74] The Guidelines further state that "[w]here an individual project is a necessary precedent for action on a larger project, or commits the lead agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project."[75] However, analysis of a larger project is not required without evidence that a larger project exists or that there is an intention to proceed with a larger, more grandiose project in the future.

The proposed Project has independent utility to connect LAUS to Dodger Stadium for games and event days, as well as providing an additional transit option in areas that are currently underserved. Accordingly, the proposed Project serves its own distinct purpose to connect the region's transportation hub to one of the region's most visited venues, serving the needs of existing stadium event attendees as well as the surrounding communities. A lead agency is not required to analyze a broader scheme or otherwise attribute a motive to an applicant based on speculation from commenters regarding a potential future action. Evaluation of future environmental effects should wait for the decisions that could cause those effects.

There is no proposal for development of, nor is there any commitment to develop, the property surrounding Dodger Stadium, through plans, or financing. The proposed Project is not a necessary precedent for an action or larger project, and has not committed Metro or any other agency to any future action related to a larger project. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not engage in improper piecemealing in its analysis of the proposed Project.

Los Angeles Football Club (LAFC). These venues are accessible directly by public transit, including the Metro A Line (Blue) and E Line (Expo). Additionally, the new SoFi Stadium in Inglewood, which began hosting the Los Angeles Rams and Los Angeles Chargers professional football teams in 2020, will be accessible via a planned people mover connecting the future Metro Crenshaw/LAX line station to the stadium.

[73] California Public Resources Code. 1970. Section 21002.1(d).

[74] CEQA Guidelines. Section 15378(a).

[75] CEQA Guidelines. Section 15165.

The Dodger Stadium Property Is Approved Only for Dodger Stadium and Ancillary Uses and Structures, and Restrictive Designations and Zoning Are Not Consistent With the Uses Speculated by Commenters

The proposed Project does not include or request environmental clearance for any actions required to enable development beyond the Stadium Tower and Dodger Stadium Station and other aerial rapid transit system components on the Dodger Stadium property. As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, on August 4, 1960, the City of Los Angeles approved a CUP for the Dodger Stadium property, which allows the operation of the 56,000-seat capacity Major League Baseball stadium and various ancillary uses and structures, as set forth in the CUP for the Dodger Stadium property. In addition, CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events."

The zoning for the Dodger Stadium property is A1-1XL (Agriculture), allowing for agricultural uses with an Extra Limited Height of two stories or 30 feet. The City of Los Angeles Municipal Code ("LAMC") only allows for single-family dwellings, parks or playgrounds, golf courses, farming, the keeping of livestock, or "any other similar uses or enterprises customarily carried on in the field of general agriculture and not obnoxious or detrimental to the public welfare."[76] The Dodger Stadium property is designated as Open Space under the City of Los Angeles General Plan and Silver Lake-Echo Park-Elysian Valley Community Plan.

The Project Sponsor may seek a Plan Approval under the existing CUP to allow for the Stadium Tower and Dodger Stadium Station, including an exception from the site's 1XL (Extra Limited Height) district designation for the proposed Stadium Tower and Dodger Stadium Station, which would exceed the 1XL district designation limits. In addition, the Project Sponsor is seeking to create a Specific Plan along the proposed Project alignment pursuant to LAMC section 11.5.7 to provide for consistent application of Project design standards, limitations, and operational measures. As noted above, CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events." As such, with approval of the amendments to the zoning code and/or the Plan Approval, development of the Stadium Tower and Dodger Stadium Station would not conflict with the applicable LAMC requirements at the time of proposed Project implementation. The proposed Project does not request any other amendments or exceptions to the Dodger Stadium Property's zoning.

The purported "future" development that commenters suggest is contemplated at Dodger Stadium, such as office, retail, hotel, and residential buildings, would require additional City designations and zoning, permits and approvals, including potentially, environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed.

[76] City of Los Angeles. 2010. Los Angeles Municipal Code Section 12.05. Available at: https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1578 (accessed August 2023).

"Next 50" Project From 2008

Comments on the Draft EIR refer to Dodger Stadium-related uses and structures proposed in 2008, over 15 years ago, by former Los Angeles Dodgers owner Frank McCourt, referred to as the "Next 50" Project. The City issued a Notice of Preparation for the Dodger Stadium: The Next 50 Years Project in 2008.[77] The then-proposed Next 50 Project sought to "provide new fan and cultural amenities, improve the ease of pedestrian circulation around the Stadium, and create a destination for fans to gather at Dodger Stadium." Proposed improvements included a grand entry to Dodger Stadium, including a plaza and promenade; a Dodger museum, dining, retail, and ticketing enhancements, and Dodger offices; a "Green Necklace," comprised of an outdoor concourse with landscaping and pedestrian circulation around the Stadium; a landscaped plaza, converted from the existing surface parking area; and parking improvements. The Next 50 Project did not proceed after 2008, and the current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR.

The current Los Angeles Dodgers owners obtained an approval from the City of Los Angeles in 2019 for the Dodger Stadium Centerfield Project,[78] which included a new front door to Dodger Stadium – the Centerfield Plaza; new concession and retail areas; new landscaping and pedestrian circulation around the Stadium perimeter; and upgraded circulation throughout the Stadium to improve overall accessibility, security, and ease of movement. The Dodger Stadium Centerfield Project was completed in 2020 prior to the issuance of the Notice of Preparation for the proposed Project. Accordingly, the Dodger Stadium Centerfield Project was not required to be included as a related Project in the Draft EIR or analyzed as part of the proposed Project in the Draft EIR.

As noted above, and as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the Dodger Stadium property is subject to a CUP, which allows the operation of the 56,000-seat capacity Major League Baseball stadium and various ancillary uses and structures as set forth in the CUP, including the improvements in the Dodger Stadium Centerfield Project. Such ancillary uses and structures are consistent with fan amenities at many Major League Baseball stadiums.

Dodger Stadium CC&Rs From 2012

Comments on the Draft EIR state that the Declaration of Covenants, Conditions, Restrictions and Easement for Chavez Ravine ("CC&Rs") demonstrate that the proposed Project was "piecemealed" from a larger development project at the Dodger Stadium property. This is not true.

Covenants, Conditions, and Restrictions are legally binding and officially recorded documents frequently used to address the rights and obligations of adjacent property owners. The purpose of the CC&Rs, which were recorded on May 1, 2012, was to address the rights and obligations of the owner of Dodger Stadium and the owner of the parking areas surrounding the Stadium, including most notably as to the Los Angeles Dodgers use of the parking areas as parking for Dodger Stadium attendees. The adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing

[77] See City of Los Angeles Notice of Preparation for Dodger Stadium: The Next 50 Years, issued on June 16, 2008 (ENV-2008-1659-EIR).
[78] Dodger Stadium Centerfield Project (City of Los Angeles Council File 19-1096; CPC-1999-0157-PAD-PA5).

stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed and no environmental analysis is required of the speculations of commenters. The CC&Rs establish procedures in connection with the rights and obligations of the owner of Dodger Stadium and the owner of the parking areas surrounding the Stadium.

Moreover, similar to the Dodger Stadium CUP provision regarding collaboration for mass transportation service to the Dodger Stadium property, the CC&Rs include a provision for the owner of Dodger Stadium and the owner of the parking areas to cooperate in connection with a proposal for mass transportation to the Dodger Stadium property, which would allow for easier and more efficient public access.

Commenters have also pointed out a provision of the CC&Rs providing that in connection with mass transportation to the Dodger Stadium property, the required number of 16,500 parking spaces established by the Dodger Stadium CUP and the CC&Rs could be reduced. However, the proposed Project is not seeking any reduction of parking spaces below the required number of 16,500 parking spaces. As described in Section 3.11, Land Use and Planning, of the Draft EIR, there are currently a total of 18,889 parking spaces on the Dodger Stadium property, and the proposed Project would remove approximately 194 parking spaces for the Dodger Stadium Station and its pedestrian connection to Dodger Stadium, along with associated hardscape and landscape improvements. Therefore, the proposed Project's transit improvements on the Dodger Stadium property are consistent with both the Dodger Stadium CUP and the CC&Rs.

TOPICAL RESPONSE H
The Draft EIR Considered an Appropriate Range of Alternatives and Design Options

Comments on the Draft EIR address the range of alternatives studied in the Draft EIR. Commenters state that the Draft EIR failed to consider a reasonable range of alternatives. The Draft EIR considered a range of reasonable alternatives to the proposed Project in compliance with CEQA and the CEQA Guidelines.

Comments on the Draft EIR also address the Transportation Systems Management ("TSM") Alternative for an enhanced Dodger Stadium Express. Commenters state that the study of the TSM Alternative must be revised and that the TSM Alternative should be pursued instead of the proposed Project. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Commenters also suggest that the TSM Alternative should have considered electrification of the TSM Alternative buses, or considered expanding bus service from other locations in order to bolster the TSM Alternative's potential benefits. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express service would remain. Further, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Moreover, the TSM Alternative is not a permanent transit connection as bus routes and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Comments on the Draft EIR also suggest that the inclusion of Design and Use Options render the Project Description unstable. To the contrary, the proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project's potential environmental impacts. In turn, Section 6.0, Design and Use Options, of the Draft EIR, includes design and use options responsive to public comments and stakeholder feedback and describes how environmental impacts from implementation of each design and use option would differ from the proposed Project's potential environmental impacts described in the Project Description and analyzed in Section 3.0, Environmental Analysis, of the Draft EIR, with respect to the particular project component variation. The design and use options provide flexibility for decision makers to potentially adopt one or more minor variations to the components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project.

The Draft EIR Considered a Range of Reasonable Alternatives

Public Resources Code sections 21001(g), 21002.1(a), and 21061 require that an EIR identify alternatives to a proposed project. CEQA Guidelines section 15126.6(a) expands on the statute by stating that an EIR must include a "reasonable range" of alternatives to the project "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Likewise, CEQA Guidelines section 15126.6(f)(2)(A) further clarifies that an EIR is not required

to analyze alternatives that would not eliminate or substantially reduce significant adverse effects. An agency's selection and consideration of alternatives is governed by a "rule of reason."[79] An agency need not consider "every conceivable alternative" and may determine how many is a reasonable range.[80]

Alternatives Analyzed in the Draft EIR

The alternatives analyzed in the Draft EIR, which are the No Project Alternative, the Spring Street Alignment Alternative, and the Transportation Systems Management ("TSM") Alternative, represent a reasonable range of potentially feasible alternatives that could reduce one or more significant impacts of the proposed Project. As presented in the Draft EIR, two project alternatives, as well as a "No Project" alternative, were described and compared with each other (including a comparison of major characteristics and significant environmental effects of each alternative) and with the proposed Project. Table 4-1, Alternatives Conformance with Objectives, and Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR, provide a comparison of the proposed Project, the proposed Project alternatives' impacts, and the proposed Project alternatives' ability to meet the Project Objectives.

The Draft EIR considers a reasonable range of alternatives that can feasibly accomplish most of the basic Project Objectives and could avoid or substantially lessen one or more of the significant effects. Alternatives that would impede, to some degree, the attainment of the Project Objectives, or would be more costly, also were considered. As required by CEQA, the alternatives analysis in Section 4.0, Alternatives, of the Draft EIR, included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project.[81] CEQA also requires that an EIR identify the "environmentally superior alternative" from the range of reasonable alternatives that are evaluated; if the "environmentally superior alternative" is the "No Project" alternative, the EIR must identify an "environmentally superior alternative" among the other alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements.

As discussed in Section 4.2, Alternatives Development Process, of Section 4.0, Alternatives, of the Draft EIR, pursuant to CEQA Guidelines section 15126.6(d), discussion of each alternative presented in the Draft EIR was intended to "'allow meaningful evaluation, analysis, and comparison with the proposed project,'" and each alternative was "evaluated in sufficient detail to determine the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the proposed Project" and was "evaluated to determine whether the proposed Project objectives . . . would be mostly attained by the alternative pursuant to CEQA Guidelines Section 15126.6(c)." Evaluation of each of the alternatives included a description of the alternative, the environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area, and the environmental impacts of each alternative as compared to the proposed Project, followed by a general discussion of the extent to which the underlying purpose and project objectives are obtained by the alternative.

[79] CEQA Guidelines, Section 15126.6(a); see also id., Section 13053.5(a).
[80] Id., Section 15126.6(a).
[81] See CEQA Guidelines Section 15126.6(e).

Alternatives Considered but Dismissed from Detailed Analysis

In compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, in Section 4.0, Alternatives, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are:

i. Failure to meet most of the basic project objectives,

ii. Infeasibility, or

iii. Inability to avoid significant environmental impacts.[82]

Section 15126.6(f)(1) of the CEQA Guidelines states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." None of these factors establish a fixed limit on the scope of reasonable alternatives or a particular number that the Draft EIR was required to analyze.

Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, in Section 4.0, Alternatives, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the Project Objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. Among the failure to meet other Project Objectives, the direct alignment alternatives would not maximize the use of public ROW and publicly owned properties while minimizing use of aerial rights over private properties. As discussed on pages 4-10 to 4-15 of Section 4.0, Alternatives, of the Draft EIR, the two alignment and station location alternatives were not carried forward for a more detailed analysis because they failed to avoid significant environmental impacts and otherwise would not meet the Project Objectives.

No Project Alternative

Pursuant to CEQA Guidelines section 15126.6(e), pages 4-18 to 4-25 in Section 4.0, Alternatives, of the Draft EIR, provide an analysis of a "No Project Alternative," in order to provide a comparison between the environmental impacts of implementing the proposed Project in contrast to those resulting from not approving, or denying, the proposed Project. The No Project Alternative would avoid potentially significant impacts to all environmental considerations and would have no impact, as the proposed Project would not occur, and the environment would remain in its existing condition. However, environmental benefits through the proposed Project's ability to reduce vehicle miles, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel, and to

[82] CEQA Guidelines, Section 15126.6(c).

implement LID source control and BMPs to minimize water runoff and water pollution would not be realized. The No Project Alternative would be unable to meet any of the Project Objectives, as summarized in Table 4-1, Project Objective Conformance, in Section 4.0, Alternatives, of the Draft EIR.

Spring Street Alignment Alternative

Similar to the proposed Project, the Spring Street Alignment Alternative would provide an aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. The Spring Street Alignment Alternative would include three stations, a non-passenger junction, and four cable-supporting towers at various locations along the alignment. The Spring Street Alignment Alternative would include the following components in common with the proposed Project: Alameda Station, Alameda Tower, Alpine Tower, Stadium Tower, and Dodger Stadium Station. In addition to these components, the Spring Street Alignment Alternative would also include the following components that would be unique to this alternative: Spring Street Junction, State Historic Park Station, and Bishops Tower. A detailed description and impacts analyses of the Spring Street Alignment Alternative's proposed alignment are provided in Section 4.2.2.2, Spring Street Alignment Alternative, of Section 4.0, Alternatives, of the Draft EIR.

Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint than the proposed Project within the Los Angeles State Historic Park. The proposed Project's Chinatown/State Park Station location was chosen over the other potential locations, including State Historic Park Station location as part of the Spring Street Alignment Alternative, because it would minimize the proposed Project's potential footprint within the Los Angeles State Historic Park while maintaining transit access to the park and surrounding communities and is closer to the Metro L Line (Gold) Station. As such, the Spring Street Alignment Alternative would not meet the following objective to the same extent as the proposed Project, and therefore, is considered to be only partially consistent with Objective 11 to "Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project."

As discussed in Section 4.0, Alternatives, of the Draft EIR, the Spring Street Alignment Alternative could result in additional sources of light and glare and shading due to the additional proposed Project components, although impacts would be less than significant. In addition, although the State Historic Park Station would be at a location not previously analyzed, this station would have similar levels of construction as the proposed Project. Potential environmental impacts of the Spring Street Alignment Alternative would generally be similar to the proposed Project, as shown in Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR.

Dodger Stadium Express | TSM Alternative

Under the Transportation Systems Management (TSM) Alternative, the proposed Project would not be constructed, and, instead, the existing Union Station Dodger Stadium Express service would be enhanced to increase capacity.

In order to meet service frequencies similar to the proposed Project, a minimum of 6 buses loading simultaneously would be required, which cannot be physically accommodated in the existing location for

the Union Station DSE, and an off-site loading facility would need to be constructed to accommodate the new level of bus activity. Furthermore, the existing Dodger Stadium Express service operates up to 8 buses per hour, while the TSM Alternative would require 77 buses per hour.

In addition to a new off-site loading facility, operational changes would be required on surrounding streets to accommodate the increased congestion from the TSM Alternative. Additional loading facilities would also be required at Dodger Stadium, including dedicated bus only lanes, to accommodate the increased level of Dodger Stadium Express service.

The TSM Alternative was identified as the "environmentally superior alternative" among the alternatives evaluated in the Draft EIR because it would avoid the proposed Project's significant and unavoidable impact with respect to construction noise and vibration without the need for mitigation, and would reduce the range of impacts to the greatest extent listed in Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR. However, as discussed in Section 4.1.3, Project Alternatives and Conformance with Objectives, in Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would not meet the majority of the Project's Objectives in full or in part, such as providing a direct transit connection between LAUS and the Dodger Stadium property via an aerial rapid transit system and improving connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS.

Specifically, the TSM Alternative would fail to fulfill the following Project Objectives because it is not an aerial rapid transit system and otherwise does not offer a unique experience to riders, and would not enhance community connectivity or park access:

- **Objective 2:** Attract new transit riders to the Metro system through a unique experience connecting to Dodger Stadium.
- **Objective 7**: Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
- **Objective 8**: Bring a world class aerial transit system to the Los Angeles area.
- **Objective 9**: Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.
- **Objective 10:** Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.
- **Objective 12:** Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.

In addition, as discussed in Section 4.1.3, Project Alternatives and Conformance with Objectives, in Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would not meet the following Project Objectives to the same extent as the proposed Project, as while it would provide a connection to Dodger Stadium, it would not provide a faster or more efficient alternative compared to the proposed Project,

and while it would transition private vehicles to DSE buses, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion:

- **Objective 1:** Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- **Objective 3:** Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
- **Objective 4:** Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
- **Objective 5:** Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- **Objective 6:** Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.

The Draft EIR Provided Sufficient Analysis to Show that Expansion/Enhancement of the Existing Dodger Stadium Express Would Not Provide Similar Benefits Without Negative Impacts

Comments state that expansion and/or enhancement of the existing Dodger Stadium Express bus service would provide similar benefits of the proposed Project but without potential negative impacts. Comments further state that the Draft EIR should have analyzed the TSM Alternative as the proposed Project.

The Draft EIR included a detailed discussion of the transportation implications of the TSM Alternative on pages 4-60 through 4-63 and on pages 4-70 through 4-73, in Section 4.0, Alternatives, of the Draft EIR in order to allow meaningful evaluation, analysis, and comparison with the proposed Project. This analysis was supported by discussion with Metro's expert tasked with managing the Dodger Stadium Express. Further, this expert is intimately familiar with contract services bus operations, including the Dodger Stadium Express and the SoFi Stadium shuttles.[83] As described on page 4-60, in Section 4.0, Alternatives, of the Draft EIR, 77 bus trips per hour would be needed to provide the equivalent passenger-carrying capacity of the proposed Project, a significant increase from the eight bus trips per hour that the Dodger Stadium Express currently uses. A number of issues are identified and evaluated in the Draft EIR regarding the difficulty and/or negative impacts of providing a substantial increase in Dodger Stadium Express service levels, whether as a result of the 77 bus trips per hour (equivalent to capacity of the proposed Project) or even to a lesser level of service:

- As discussed on page 4-60, of Section 4.0, Alternatives, of the Draft EIR, even at the current level of LAUS DSE operation, Metro has already moved the loading zone for the existing DSE numerous times in response to operational challenges encountered over many years of operating the Dodger Stadium Express. Metro staff have studied ways to facilitate multiple buses loading simultaneously and have found that there is insufficient curb loading capacity currently at LAUS.

[83] As noted on pages 4-60 and 4-62 in Section 4.0, Alternatives of the Draft EIR, the analysis was informed by personal communication with Mr. George Del Valle, Principal Transportation Planner, Metro Contract Services, on May 31, 2022.

- Loading and unloading 77 buses in a timely and efficient manner would require a substantially larger loading zone. As discussed on pages 4-60 and 4-61 and shown on Figure 4-13 on page 4-62, of Section 4.0, Alternatives, of the Draft EIR, the approximate footprint of a dedicated loading zone would need to be approximately as large as the shuttle bus loading facility at SoFi Stadium in the City of Inglewood. The Draft EIR identified the top deck of the Metro Division 13 bus maintenance facility as a potential site given its similar size.
- As discussed on page 4-61 of Section 4.0, Alternatives, of the Draft EIR, use of Division 13 would cause considerable disruption to existing Metro transit operations, which use the facility not only for Division 13 maintenance but also for bus layovers supporting bus services in Patsaouras Plaza.
- As discussed on pages 4-61 and 4-72 of Section 4.0, Alternatives, of the Draft EIR, use of Division 13 would extend the transfer walking time for passengers and would cause a substantial increase in vehicle/pedestrian conflicts since the riders of the enhanced Dodger Stadium Express (upwards of 5,000 additional pedestrians per hour) would need to cross two legs of the Cesar E. Chavez Avenue/Vignes Street intersection to transfer between the transit services at LAUS and the maintenance facility. Traffic Control Officers would be needed as mitigation for the potential increase in hazards, and increased traffic congestion and queue spillback would affect on-time performance for existing bus transit services at Patsaouras Plaza and on Cesar E. Chavez Avenue.
- Physical modifications would need to be made to the Metro Division 13 maintenance facility to accommodate the high volume of pedestrians arriving and departing.
- As stated on pages 4-62 and 4-72, of Section 4.0, Alternatives of the Draft EIR, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium as part of the TSM Alternative. The existing bus-only lanes on Sunset Boulevard and Cesar E. Chavez Avenue are only in operation between 7 a.m. and 9 a.m. in the eastbound direction and between 4 p.m. and 7 p.m. in the westbound direction, Mondays through Fridays. The hours of operation of these bus-only lanes could potentially be provided to be westbound on Sunset Boulevard and Cesar E. Chavez Avenue before every game (not just weekday evening games) and eastbound on Sunset Boulevard and Cesar E. Chavez Avenue after every game. This would expedite DSE service (both for the existing DSE service and the TSM Alternative), but could also increase traffic congestion and would displace existing curb parking that is currently used by the community.

A number of comments also suggest that an expanded fleet of buses for expanded Dodger Stadium Express service would be available for other uses or local service when not needed for Dodger Stadium events. Such a system would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded DSE service, would result in a fleet of buses that would be underutilized most of the time, or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held.

As discussed on page 4-63 and on page 4-71, in Section 4.0, Alternatives, of the Draft EIR, the Draft EIR concluded that, even with a substantially increased Dodger Stadium Express bus capacity, the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would

render the Alternative substantially less competitive with driving time than the proposed Project, thus reducing its ridership potential compared to the proposed Project. As such, reductions in driving to Dodger Stadium and associated reductions in VMT would be less than for the proposed Project.

Electrification of Dodger Stadium Express Shuttle Buses

Comments state that the TSM Alternative in the Draft EIR did not consider electrification of shuttle buses. These comments suggest that Metro is considering transitioning its bus fleet to zero-emission buses and, therefore, would provide the same net benefits as the proposed Project. The Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.[84] While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that "the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues." Further, unlike the proposed Project, which, as discussed in Section 3.08, Greenhouse Gas Emissions, of the Draft EIR, has pledged to purchase power required for operation of the proposed Project from the City of Los Angeles Department of Water and Power ("LADWP") through the utility's Green Power Program, pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid's ability to provide the electricity that Metro would require for a full zero-emission bus fleet.

Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding Dodger Stadium Express service discussed on pages 4-60 through 4-63 and on pages 4-70 through 4-73, in Section 4.0, Alternatives, of the Draft EIR, and in this topical response above, would remain.

Bus-Only Lanes on Vin Scully Avenue

A number of comments suggested that bus-only lanes should be provided on Vin Scully Avenue. As stated on pages 4-62 and 4-72, in Section 4.0, Alternatives of the Draft EIR, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium and also within the Dodger Stadium property as part of the TSM Alternative. While this would improve Dodger Stadium Express service, this would also increase traffic congestion on Vin Scully Avenue and within the Dodger Stadium property.

Alternatives Providing Bus Service From Other Locations Would Not Materially Improve Transit Time Compared to Driving and Would Incur Substantial Costs

Comments suggest that a bus-only alternative should analyze buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events. Such a system would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time, or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and

[84] https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf.

mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving.

The current Dodger Stadium Express service from the South Bay is an existing example of the type of service these comments suggest, although it is one line instead of many. Riders can board the South Bay DSE at any one of five different stations along the Harbor Transitway: Harbor Gateway Transit Center, Rosecrans Station, Harbor Freeway Station, Manchester Station, and Slauson Station. Thus, despite serving a broad area of southern Los Angeles County at stations spread across eight miles, that the service is free, and that the service travels on a priority lane within the I-110 freeway median for most of its trip, the South Bay DSE carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Based on existing ridership patterns of the Dodger Stadium Express, including the mode of access survey data collected by Metro included in Appendix N, Transportation Appendices, of the Draft EIR, the majority of Dodger Stadium Express riders take rail transit to connect with the Dodger Stadium Express, which is the key differentiator as to why the LAUS Dodger Stadium Express has higher ridership than the South Bay Dodger Stadium Express. Improving the connections between Dodger Stadium and LAUS via the proposed Project would provide the quickest, most frequent, and highest capacity transit connections for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Pedestrian Enhancement Alternative

Comments on the Draft EIR suggest that a pedestrian enhancement alternative to the proposed Project, studying the potential to improve the pedestrian experience from Chinatown to Dodger Stadium by including bike lanes, improved and widened sidewalks, and escalators and/or stairs, should have been included in the Draft EIR. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of the Pedestrian Enhancement Alternative, which was considered but dismissed from further consideration for failure to meet most of the basic Project Objectives to the same degree as the proposed Project. For instance, the Pedestrian Enhancement Alternative would not meet the Project Objectives to expand mobility options for transit riders, attract new riders to the Metro system, enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, increase connectivity to the region's public transportation hub at LAUS and the Dodger Stadium property, or to improve the Dodger Stadium visitor experience by providing efficient, high-capacity and faster alternative access to Dodger Stadium, to the same extent as the proposed Project.

The Project Objectives Do Not Artificially Narrow the Range of Alternatives Considered

Comments on the Draft EIR suggest that the Project Objectives are artificially narrow in order to preempt adoption of the TSM Alternative as the preferred alternative. The Project Objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium.

An EIR's project description must contain a statement of the project objectives, which are used by the lead agency to help it develop a reasonable range of alternatives to the proposed project to evaluate in the EIR.[85] An EIR need not present alternatives that are incompatible with the project's fundamental purpose, so a lead agency may structure the EIR alternatives analysis based on a reasonable definition of the project's underlying purpose and need not study alternatives that cannot achieve that fundamental goal. As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. The proposed Project is needed to alleviate existing congestion and associated air pollution while providing safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed Project alignment and the region's rapidly growing regional transit system at LAUS. Aerial rapid transit technology is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Alternatives that would not provide a permanent transit connection to Dodger Stadium would not achieve the proposed Project's underlying purpose to provide such a transit connection.

In defining a project's objectives, the lead agency may not adopt artificially narrow project objectives that would preclude consideration of reasonable alternatives for achieving the project's underlying purpose. The Project Objectives are designed to achieve the proposed Project's underlying purpose of providing a direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. These objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree."[86] The Project Objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. A reasonable range of alternatives were considered as the Project Objectives are not so narrow that they preclude consideration of alternatives to the proposed Project, including the TSM Alternative. CEQA does not require that the alternatives considered meet each and every objective, and in fact, some of the alternatives considered did not. In addition, CEQA does not require that the objectives for the proposed Project be so broad to require consideration of alternatives that do not meet the project's underlying purpose.

[85] CEQA Guidelines Section 15124(b).
[86] CEQA Guidelines, Section 15126.6(a)–(b).

The Use of Design Options Does Not Render the Project Description Unstable

As discussed in Section 6.0, Design and Use Options, of the Draft EIR, five design and use options were considered to explore potential variations to various Project components in response to public comments and stakeholder feedback. Each design and use option offers a variation to the proposed Project. The design and use options are not "alternatives" within the meaning of CEQA as they address specific elements of the proposed Project and are not alternatives to the proposed Project as a whole. The design and use options are responsive to public comments and stakeholder feedback and provide flexibility for the lead agency's decision makers to potentially adopt one or more minor variations to the components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project.

Section 3.0, Environmental Analysis, of the Draft EIR analyzes the proposed Project without any design and use options. Section 6.0, Design and Use Options, of the Draft EIR describes each design or use option and analyzes the environmental impacts of the proposed Project with each design or use option, performing the impact analysis relative to the respective Project component of the proposed Project.

Comments state that the inclusion of the design and use options in the Draft EIR renders the Project Description unstable. The proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project's potential environmental impacts. In turn, Section 6.0, Design and Use Options, of the Draft EIR describes how environmental impacts from implementation of each design and use option would differ from the proposed Project's potential environmental impacts described in the Project Description and analyzed in Section 3.0, Environmental Analysis, of the Draft EIR. By analyzing the design and use options in a separate section of the Draft EIR, the lead agency retains the flexibility to respond to stakeholder concerns related to individual components of the project while maintaining a stable project description that identifies the project's main features and other information sufficient to foster a complete and informative evaluation of the project's environmental impacts.[87] The design and use options studied in Section 6.0, Design and Use Options, of the Draft EIR, each present a minor variation to a component of the proposed Project, do not require different project design features or result in new or different impacts requiring different mitigation measures, and otherwise meet the same Project Objectives. The Draft EIR's Project Description provides the required "main features" of the proposed Project, with the Design and Use Options providing minor variants to the proposed Project.

[87] CEQA Guidelines § 15124. Specifically, CEQA Guidelines Section 15124 requires a project description to include a description of the project's location, a statement of the project's objectives, a description of the project's technical and environmental characteristics, a discussion of the intended uses of the EIR, and a list of the project approvals that will be required.

TOPICAL RESPONSE I
Use of Project Design Features and Plans in Mitigation Measures

Comments on the Draft EIR state that the incorporation of plans or future studies in mitigation measures results in impermissible deferral. The use of plans and future studies are commonplace measures used to tailor mitigation measures to reflect the environmental conditions at the time the potential impact would occur. Moreover, the mitigation measures requiring plans or future studies are incorporated within the proposed Project's Mitigation Monitoring and Reporting Program as mandatory elements of the proposed Project, along with other enforcement and timing mechanisms, and include specified performance standards and steps for the implementing agency to follow to achieve compliance with the specified performance standard.

Comments on the Draft EIR contend that the use of Project Design Features impermissibly obscures the Project's environmental effects. Commenters specifically point to project design features intended to provide additional environmental benefits in the Cultural Resources and Wildfire context, where the environmental impact was already determined to be less than significant. The Draft EIR disclosed the environmental impact determination prior to the implementation of the Project Design Features. The Project Design Features provide additional environmental benefits for the respective impact area and do not obscure the proposed Project's environmental effects.

The Development of Plans in Mitigation Measures Is Not Impermissible Deferral

The proposed Project's Mitigation Measures would not result in improper deferral of mitigation. CEQA Guidelines section 15126.4(a)(1)(B) confirms that mitigation measures may defer formulation of specific details regarding how to mitigate a significant impact when it is impractical or infeasible to specify the specific details of mitigation during the EIR review process, provided that the lead agency commits to implement the mitigation, adopts a specified performance standard, and identifies the types of actions that may achieve compliance with the performance standard. Future studies may be used to tailor mitigation measures to fit on-the-ground environmental conditions. The proposed Project's Mitigation Measures satisfy each of these requirements.

The Use of Future Studies or Plans in Mitigation Measures Is Appropriate Where Needed to Reflect Existing Environmental Conditions at the Time of Construction or Where Such Studies Are Impracticable at This Juncture

The proposed Project's Mitigation Measures appropriately require the development of plans or further study where the plans would reflect the current environmental conditions at the time of construction or it is impracticable to conduct the studies prior to the EIR's certification. For example, Mitigation Measure TRA-B, requiring the preparation of a construction traffic management plan that would "ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project" because it is currently unknown what other construction for related projects may be occurring at the same time as the proposed Project. It is not feasible to finalize the plan at the Draft EIR stage, and the plan would be drafted based on the advanced design work and study completed for the proposed Project and the current environmental conditions at the time construction for the proposed Project would begin. Mitigation Measure TRA-B provides a precise

accounting of what the construction traffic management plan would include, as well as specific performance standards that the plan is designed to achieve, as discussed in further detail below.

Mitigation Measure TRA-C similarly is intended to reflect on-the-ground environmental conditions at the time of the proposed Project construction. Mitigation Measure TRA-C requires the preparation of a Temporary Disaster Route Plan "[p]rior to the issuance of a building permit for the proposed Project, in coordination with and subject to the approval of LADOT."[88] This plan would be drafted based on the advanced design work and study completed for the proposed Project and the current environmental conditions at the time construction for the proposed Project would begin.

With respect to Mitigation Measures CUL-A and CUL-C through CUL-E, as acknowledged on page 3.5-2, Section 3.05, Cultural Resources, of the Draft EIR, "an archaeological resource may not be recognizable or even observable without ground-disturbing activities." Mitigation Measures CUL-A and CUL-C through CUL-E accordingly outline actions that would be taken in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture.

For the same reasons, Mitigation Measure GEO-B, discussed on page 3.7-21, of Section 3.07, Geology and Soils, of the Draft EIR requires the preparation of a Paleontological Resources Monitoring and Mitigation Plan, allowing a qualified paleontologist to tailor monitoring to the on-the-ground conditions, such as the "rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials" as discovered "during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits." None of these actions may be taken in advance of proposed Project approval, as excavation or other such ground disturbance to discover any potential additional resources is impracticable at this juncture. As noted on page 3.7-12, of Section 3.07, Geology and Soils, of the Draft EIR, "fossils have been encountered at depths ranging from 35 to 100 feet at locations southeast and northeast of the Project site." Accordingly, in order to potentially determine whether construction of the proposed Project would encounter paleontological resources, excavation of at least 35 feet and up to 100 feet would be required. Excavation to this depth prior to the potential approval of the proposed Project is impracticable, and would require significant disruptions in order to close portions of streets and right-of-way where the proposed Project's foundations and columns would be located to test the areas where excavation and ground disturbing activities would occur. For reference, as noted on page 3.7-19, of Section 3.07, Geology and Soils, of the Draft EIR, "[c]onstruction work is anticipated to reach up to 125 feet in depth for installation of the piles and an excavation depth of up to 10 feet, except for at the proposed Dodger Stadium Station, which has an excavation depth of 42 feet." Therefore, monitoring described in Mitigation Measure GEO-B is appropriately reserved as part of the construction in order to avoid the need to excavate more than once in connection with the proposed Project.

Likewise, Mitigation Measure HAZ-A would not impermissibly defer mitigation. As discussed in Section 3.09, Hazards and Hazardous Materials, Appendix K, Phase I Environmental Site Assessment, and Appendix L, Hydrology Technical Report, of the Draft EIR, the Draft EIR conducted an extensive preliminary

[88] Draft EIR, Section 3.17, Transportation, p. 3.17-69.

investigation of the proposed Project's sites to determine whether the site exhibited contamination from hazardous materials or would otherwise have impacts to groundwater. Based on this investigation, the Draft EIR concluded that additional investigation may be appropriate, although a full investigation is impracticable at this time because the Project Sponsor does not have access agreements for all the underlying properties and would have to obtain these agreements prior to testing. Moreover, it is appropriate for the Project Sponsor to test soils for contamination at the time the soil is disturbed and properly handle and remove any contaminated soil or groundwater at this time for off-site disposal and/or recycling, as outlined in Mitigation Measure HAZ-A. Nevertheless, in response to comments on the Draft EIR requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

Mitigation Measure GEO-A requires the preparation of a Site-Specific Final Geotechnical Report. As discussed on page ES-50 of the Executive Summary, and page 3.7-20, of Section 3.07, Geology and Soils, of the Draft EIR, Mitigation Measure GEO-A requires the Project Sponsor to "engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and the California Geotechnical Survey Special Publication 117 (as amended)." The "submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety." Further, the "site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design." The details of the mitigation measures are appropriately left to the time when later design work has been completed, coupled with review from qualified engineers, in compliance with pertinent codes.

Metro Has Committed to Implementing the Proposed Project's Mitigation Measures

All of the proposed Project's Mitigation Measures (and Project Design Features) are incorporated in the proposed Project's Mitigation Monitoring and Reporting Program, provided in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, as mandatory elements of the proposed Project. Accordingly, Metro has committed to implementing the proposed Project's Mitigation Measures.

The Mitigation Measures also provide enforcement mechanisms for Metro or the appropriate responsible agency. (See e.g., Mitigation Measure TRA-B, Draft EIR, § 3.17, Transportation, p. 3.17-67 [requiring Construction Traffic Management Plan to be approved by the City of Los Angeles prior to the issuance of

a building permit for the proposed Project]; see also Mitigation Measure NOI-A, Draft EIR, § 3.13, Noise, p. 3.13-68 [requiring the Project Sponsor to "design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors" "prior to the issuance of grading permits for the proposed Project."].)

The Mitigation Measures Outline Specific Performance Standards and Actions to Meet the Provided Performance Standard

The proposed Project's Mitigation Measures adopt specific performance standards and outline specific actions to be implemented for Metro or the appropriate responsible agency to determine that the proposed Project has met the specified performance standard. For example, Mitigation Measure TRA-B provides that the Construction Traffic Management Plan would maintain "visibility to open pedestrian crossings" and "ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during construction." Mitigation Measure NOI-A, discussed on page 3.13-68, of Section 3.13, Noise, of the Draft EIR, requires the preparation of a Construction Noise Management Plan "prior to the issuance of grading permits for the proposed Project" that would "provide a range of noise reduction between 5 dBA and 15 dBA." Conditions requiring compliance with regulations are common and reasonable mitigation measures and serve as an appropriate performance standard. Mitigation Measure HAZ-A requires "methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations, and be protective of workers and the environment." Refer to Section 5.0, Corrections and Additions, of the Final EIR for revisions to Mitigation Measure HAZ-A clarifying that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Mitigation Measure GEO-A requires the submittal of a "site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and the California Geotechnical Survey Special Publication 117 (as amended)." Conditions requiring compliance with regulations are common and reasonable mitigation measures and serve as an appropriate performance standard. The "submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety."

As such, the proposed Project would not impermissibly defer the formulation of mitigation due to the measures requiring the preparation of various plans or studies.

Plans and Studies Contemplated in Mitigation Measures Are Not Required to Be Developed During the Draft EIR Process or Prior to Project Approval

Comments state that Mitigation Measure TRA-B, which requires the implementation of the CTMP prior to the issuance of the relevant building permits, Mitigation Measure VIB-A, requiring the adoption of a Vibration Monitoring Plan prior to the issuance of a grading permit, and Mitigation Measure TRA-C, which

requires the preparation of a Temporary Disaster Route Plan prior to the issuance of a building permit for the proposed Project, impermissibly defer mitigation because the mitigation plans are not required to be adopted prior to Project approval or during the Draft EIR process. CEQA does not require these plans to be adopted prior to project approval or during the Draft EIR review process. As discussed above, CEQA recognizes that the development of plans or future studies may be appropriate to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact.

The Recognition that Certain Aspects of Mitigation Measures May Be Infeasible Does Not Violate CEQA

Comments also state that Mitigation Measures CUL-A and CUL-F are ineffective because they include the words "if feasible." For Mitigation Measure CUL-A, this recognition that regulatory requirements will be adhered to "including . . . practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible," does not render the measure ineffective but recognizes that all regulatory requirements would be adhered to the extent necessary for the pertinent resource. Mitigation Measure CUL-A includes a long list of required measures to be included in the CRMMP. Further, the language in Mitigation Measure CUL-A requiring SHPO consultation and "practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible" is verbatim from the statutory requirements of Public Resources Code section 5024(a). Consistent with the requirements of CEQA Guidelines Section 15126.4(b)(3), Mitigation Measure CUL-A and CUL-F recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites, but may not be feasible, allowing for data recovery in such circumstances. Accordingly, the recognition of "feasibility" is directly consistent with the CEQA Guidelines. Mitigation Measure CUL-F recognizes that park amenity structures "will be reconfigured to avoid and/or diminish impacts to those features as feasible." This recognizes that the extent of archaeological features at the Los Angeles State Historic Park prior to the testing phase described in Mitigation Measure CUL-E is unknown without additional testing and ground disturbance, and it is impracticable for the measure to commit to a relocation of the amenities to avoid and/or diminish impacts without knowing the exact location of the features. Mitigation Measure CUL-E provides that the proposed Project would seek to avoid any potential archaeological features. Even if avoidance is not feasible, with the implementation of the actions described in Mitigation Measures CUL-E and CUL-F, such as outlining where and in what soils mechanical excavations may or may not be used and identifying criteria thresholds for data recovery, as well as reconfiguring the location of park amenity structures as necessary following the implementation of the measures in Mitigation Measure CUL-E, potential impacts would be less than significant.

CUL-PDF-E and WFR-PDF-A Are Not Mitigation Measures

Commenters state that CUL-PDF-E and WFR-PDF-A improperly defer mitigation. CUL-PDF-E and WFR-PDF-are Project Design Features and are accordingly intended to provide additional environmental benefits, rather than mitigate a significant impact. These Project Design Features are incorporated into the proposed Project's design in order to further minimize environmental impacts but do not mitigate a significant environmental impact.

Commenters state that CUL-PDF-E is intended to reduce an environmental impact. Mitigation measures are provided in MM-VIB-A and MM-VIB-B to reduce potential building damage resulting from vibration, including to the *El Grito* mural. After the imposition of these measures, there will be a less than significant vibratory impact with respect to the generation of excessive groundborne vibration or groundborne noise levels. In turn, CUL-PDF-E provides for the adoption of a Construction Monitoring Plan for the *El Grito* mural, requiring that in the event that damage to the *El Grito* mural is documented as a result of construction activities, the Project Sponsor would retain an experienced professional to carry out the repairs within 12 months of the proposed Project's completion. CUL-PDF-E is appropriately a project design feature because it is not required to mitigate any environmental impacts related to cultural resources. Construction of the proposed Project is not anticipated to result in damage that would affect the mural's cultural significance,[89] but the Draft EIR nevertheless adds a Project Design Feature to provide for monitoring of the mural and repair if any damage is caused by construction activities. This is not intended to mitigate an environmental impact, but rather to provide an additional environmental benefit.

With respect to WFR-PDF-A, the Draft EIR determined that there would be less than significant impacts with respect to Wildfire. WFR-PDF-A, discussed on page 3.20-47 of Section 3.20, Wildfire, of the Draft EIR, requires the Project Sponsor to prepare a Fire Protection Plan to "further reduce risks associated with the ignition of wildland fire." Because these measures are not intended to reduce a significant impact under CEQA, but instead to provide additional environmental benefits where impacts are already considered less than significant, CEQA requirements regarding mitigation are inapplicable.

Funding for Mitigation Measures

Comments on the Draft EIR state that the proposed Project must demonstrate proof of financing for Mitigation Measures misconstrue CEQA's requirements. CEQA requires the identification of mitigation measures that could reduce the proposed Project's potential significant environmental impacts.[90] CEQA does not require a full accounting of how each mitigation measure will be funded. The Draft EIR provided a detailed list of Mitigation Measures for the proposed Project, as outlined in Table ES-2, Summary of Environmental Impacts, of the Draft EIR.

The Project Design Features and Mitigation Measures identified and analyzed in the Draft EIR are included in the Mitigation Monitoring and Reporting Program set forth in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, and would be mandatory elements of the proposed Project. The Mitigation Monitoring and Reporting Program outlines the procedures for the implementation of each Mitigation Measure identified in the Draft EIR, including the monitoring agency, the timing of implementation, monitoring frequency, and actions indicating compliance with the Mitigation Measure.

The Project's Use of Project Design Features Does Not Obscure Project Impacts

CEQA Guidelines sections 15070(b)(1) and 15126.4(a)(1)(A) specifically permit the incorporation of Project Design Features designed to reduce potential adverse impacts. Commenters state that the Project Design Features are mitigation measures in disguise, intended to obscure the proposed Project's impacts, citing to *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 ("*Lotus*"). The Draft EIR identified

[89] Draft EIR, Section 3.13, Noise, p. 3.13-68.
[90] California Public Resources Code Section 21100(b)(3); 14 California Code of Regulations Section 15126(b)(3).

whether environmental impacts would be significant in the absence of mitigation. The proposed Project's environmental consequences were described, the need for mitigation was identified, and the sufficiency of proposed mitigation measures was considered. The Draft EIR also identified Project Design Features which would provide additional environmental benefits but which are not intended to mitigate for identified significant impacts.

Commenters state that CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D and CUL-PDF-E are mitigation measures rather than project design features. These Project Design Features are not mitigation measures to reduce potential cultural resources impacts as there are no significant or direct cultural resources impacts anticipated to the underlying resource. (See, e.g., Draft EIR, pp. 3.5-35 to 3.5-46 [discussing CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E].) Within the cultural resources context, these measures are properly defined as project design features intended to provide additional environmental benefits rather than to mitigate a potential environmental impact.

Further, all of the Project Design Features and Mitigation Measures identified and analyzed in the Draft EIR are included in the Mitigation Monitoring and Reporting Program set forth in Section 7.0, Mitigation Monitoring Reporting Program, of this Final EIR, and would be mandatory elements of the proposed Project.

TOPICAL RESPONSE J
Gondola Design and Operations

Comments on the Draft EIR address the proposed Project's gondola design and operations. Commenters question whether the proposed Project would be able to achieve the operational capacity stated in the Draft EIR, including in a manner that would enable the safe and comfortable boarding of all passengers. The proposed Project would be able to carry up to approximately 5,000 passengers per hour per direction ("pphpd"). As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would comply with the accessibility requirements of the Americans with Disabilities Act.

Commenters question how the proposed Project cabins would be supplied with adequate power. Cabins would be supplied with power by means of batteries located on each cabin. Commenters also state that the proposed Project would become unsafe and inhospitable to passenger use over time. As discussed in Section 2.0, Project Description, of the Draft EIR, the system operator would perform routine maintenance on the proposed Project and would observe the overall system on a daily basis as part of the system's startup routine. Commenters also state that passengers of the proposed Project could be exposed to unsafe conditions within cabins as a result of either other passengers or the overall system's safety. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins and overall system would be equipped with security features for passenger safety within cabins.

Finally, commenters state that passengers would be rendered unsafe in the event of an emergency affecting the wider system of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, an Emergency Operations Plan would be prepared as part of the proposed Project and would set forth guidelines for a wide range of scenarios. Furthermore, aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Capacity

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 passengers pphpd. Based on the current design, the calculated characteristics when operating at system capacity (e.g., during Dodger games or events at Dodger Stadium) would be approximately 53 cabins in service on the system. Under this scenario, the cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds).

The proposed Project's Tricable Detachable Gondola system ("3S")[91] cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd.

[91] As discussed in Section 2.0, Project Description, of the Draft EIR, the naming convention for this system is derived from the German word "seil," which translates in English to "rope." Hence, Tricable Detachable Gondola systems are known as "3S" systems due to the use of three ropes, or cables.

To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd.

Boarding

During typical operations, as they enter a station, the cabins would slow down to a speed of roughly one foot per second (less than one mile per hour) to allow passengers to enter and exit the moving cabin. For reference, a typical walk is approximately 3.5 feet per second, as used in the California Manual of Uniform Traffic Control Devices (CA MUTCD). This cabin deceleration is achieved by detaching the cabins from the haul rope in the station. Once a cabin is detached from the haul rope, the cabin can move at a speed independent of the haul rope. If needed, a cabin could be stopped to accommodate passenger boarding. At peak operations, it is anticipated cabins would arrive in a station approximately every 23 seconds and, once a new load of passengers has boarded, the cabin would re-attach to the cable and advance to the next station.

The boarding platforms at Alameda Station, Chinatown/State Park Station, and Dodger Stadium Station have been sized to accommodate the capacity of the proposed Project. At Alameda Station and Dodger Stadium Station, a minimum of 30 linear feet would be provided for each of the unloading and loading zones. This equates to at least 30 seconds for any unloading passengers and at least another 30 seconds for loading passengers. There is a physical separation between the unloading and loading areas. Passengers would unload from cabins on one side of the boarding platform and after a physical separation, passengers would load onto cabins on the other side of the platform. Accordingly, unloading and loading passengers would be separated. Because of this separation, all passengers on one side of those stations are moving in the same direction, encouraging efficiency and order. By way of comparison, it is typical in heavy and light rail stations for passengers to board and disembark from trains on the same platform. Because the Alameda Station and Dodger Stadium Station would separate areas for unloading and boarding, these stations would see efficiency beyond what may typically be experienced at heavy and light rail stations.

At the Chinatown/State Park Station, the boarding platform would be similarly designed to accommodate the capacity of the proposed Project. The Chinatown/State Park Station would be comprised of three levels: ground, mezzanine, and boarding. The ground level would provide elevators, escalators, and stairs that would lead up to the mezzanine. The mezzanine level would provide queueing space and provide access to the boarding platform by elevators, escalators, and stairs. Approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station, and queues would therefore be accommodated within the Station, given this lesser boarding demand and the larger queuing capacity at the Station.

Because the station speed of the cabins would be slower than the line speed, the station speed would enable multiple cabins to be in the station at one time. Cabins would arrive every 23 seconds during peak operations and maintain this time separation. Since a cabin would spend at least 30 seconds in the unloading zone, more than one cabin would be present in an unloading zone for some of the time.

Similarly, more than one cabin would be present in the loading zone some of the time. During peak operations, multiple cabins would be loading and unloading passengers in each station at any given time.

Accessible Boarding

As discussed in Sections 2.4.3, Stations and Junctions, and 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, the stations and cabins would comply with the accessibility requirements of the Americans with Disabilities Act ("ADA").

Pathways to and from the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry width and interior size of each cabin would comply with the requirements of the ADA.

The proposed Project cabins would have level boarding, which means that there would be no step from the boarding platform surface to the cabin floor. The gaps between the boarding platform and cabin floor would comply with industry standards and ADA requirements regarding both horizontal separation and vertical alignment.

If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

Cabin Power

Comments on the Draft EIR address the cabins of the proposed Project and how they will be supplied with adequate electrical power. As noted in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, the cabins are expected to have certain amenities, including HVAC, which require electrical power.

Power for the cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment. Multiple technologies exist to enable continuous battery charging during system operations. The battery charging technology, as well as the size and capacity of cabin batteries, will be determined as design is completed for the proposed Project.

Privacy Glass

As discussed in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Privacy glass is glass which has been treated to allow control of the window's transparency. This is done by running a small electric current

through the pane of glass; when the electric current passes through the pane of glass, it changes the glass from opaque to transparent, or vice versa. The control system for the proposed Project can be programmed to turn on and off the privacy glass while cabins are adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Maintenance

As noted in Section 2.7.5, Maintenance, in Section 2.0, Project Description, of the Draft EIR, maintenance activities would be performed by the operator and would include daily pre-operational inspection of the system as well as long-term maintenance activities. The operation and maintenance of the system would be closely linked since the operating schedule would be the primary driver for the maintenance needs of the proposed Project. Further, the required maintenance would affect the operating schedule. As discussed in Section 2.7.6, Safety Systems and Ancillary Elements, in Section 2.0, Project Description, of the Draft EIR, maintenance recommendations including inspection procedures and scheduled activities are required to be provided by the equipment provider and would be included in the required maintenance manual. Maintenance recommendations would be akin to those provided by a vehicle manufacturer, which include a list of recommended maintenance activities (e.g., oil change, tire rotation, etc.) and when to perform them. In addition, the inspection procedures would also include circumstances that would trigger the need for additional maintenance activities.

Rider Safety

As noted in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, each cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. Since the cameras would be monitored, there is an opportunity for operation personnel to identify developing situations and intervene verbally. Operators would have communications protocols with appropriate law enforcement and first responders.

In addition to operator-initiated communications, cabins would be equipped with "push to talk" buttons to open communications with operators. Through use of these buttons, passengers can open communications with operators at any time. Operators would then be able to respond accordingly based on established safety protocols and training, which would be developed in conjunction with first responders. In the event of a security incident taking place inside a cabin, cabins would be stopped at the next immediate station in a matter of minutes. Travel times would be approximately 2.5 minutes between Alameda Station and Chinatown/State Park Station and approximately 3.5 minutes between Chinatown/State Park Station and Dodger Stadium Station.

In stations and areas adjacent to them, attendants would also be able to observe activities or disturbances. During Dodger games and events at the Stadium, it is anticipated that either additional security or additional trained staff would be present to reduce both the probability of security issues and the response time to any such situations.

Emergency Operations

As noted in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, an Emergency Operations Plan would be prepared as part of the proposed Project and would set forth guidelines for a wide range of scenarios. The Emergency Operations Plan would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD). The purpose of the Emergency Operations Plan would be to determine appropriate actions in advance of situations that could impact the operation of the proposed Project. Examples of scenarios for consideration by the Emergency Operations Plan could include fires in nearby buildings or system components, bomb threats, earthquakes or other natural disasters, medical emergencies, or a system failure of the proposed Project.

Because such scenarios could involve action by, coordination with, or participation from local agencies such as LAPD or LAFD, the Emergency Operations Plan would be developed in coordination with those agencies. Formal coordination with relevant agencies on emergency protocols would commence in future design phases of the proposed Project.

As noted in Section 2.7.6, Safety Systems and Ancillary Elements, in Section 2.0, Project Description, of the Draft EIR, the proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures which prohibit the movement of the gondola cabins. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload passengers from the system. Additional redundancies could include elements such as bullwheels, brakes, and conveyors. In a number of failure scenarios, it would be possible to assess the failure, switch to an alternate mode or component and proceed with operations.

For an example of how a redundancy might operate in practice, it is possible that a set of cabin doors might fail to confirm that they are locked properly. The system would initiate a stop while the cabin is still in the station and an operator would investigate. If something was simply obstructing the doors, the locking sequence could be repeated and confirmed, and the cabin and system could resume operations normally. If, however, there was a problem either with the doors or with the sensors that should confirm the locked position, the passengers in the cabin could be relocated to another cabin, and the inoperable cabin would be removed from service and repaired.

The use of these redundancies would reflect the philosophy not only that unplanned outages are inconvenient, but that the safest place for passengers is in the cabin, and that the safest way for passengers to exit cabins is at a station. However, the Emergency Operations Plan would also consider the unlikely scenario that the system and cabins cannot be moved to the nearest station and that passengers must therefore be evacuated directly from the cabins. As discussed in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, such an evacuation would involve emergency response services and would use specialized equipment such as ladder trucks, bucket trucks, or descending devices. An Evacuation Plan would be developed as part of the Emergency Operations Plan as required by industry standard ANSI B77.1 and Cal/OSHA regulations, to describe the preferred methods of evacuation based on the location of cabins, environmental conditions, and unusual terrain. The Evacuation Plan would include the required equipment and procedures for evacuation, site control, and

passenger communications. Analysis and coordinated practice of the evacuation modes would be performed in advance of opening the system. The Evacuation Plan would document the procedures, equipment and personnel necessary to evacuate the system, as well as provide for documenting training and practice. Such analysis, practice, and documentation are required by Cal/OSHA.

ANSI B77.1 requires that the Evacuation Plan include at a minimum:[92]

a) the definition of the line of authority in the event of an evacuation. This line of authority shall list:
    1) the positions responsible for determining the need for and ordering of an evacuation by use of the evacuation power unit or evacuation from carriers;
    2) the personnel responsible for performing the evacuation, for first aid, and for ground care of evacuated passengers.
b) a description of the equipment necessary for evacuation and where it will be stored;
c) provisions for adequate training in the functions performed in the evacuation process at least once each operating season. The training shall address variables including, but not limited to, the type of carriers and grips, passenger demographics, adaptive equipment, and topography as well as evacuation systems and equipment. Training shall be recorded in the evacuation log;
d) an estimate of the time necessary for the total evacuation of each aerial lift;
e) a description of unusual terrain, surface vegetation, and other conditions under the aerial lift and how each of these conditions will be dealt with during an evacuation;
f) an estimate of when the evacuation should begin in the event the aerial lift becomes inoperable;
g) provisions for communications with passengers of an inoperable aerial lift, the frequency of such communication, how soon after the aerial lift becomes inoperable such communication to the passengers will start, and the frequency of communications thereafter;
h) the methods of evacuation to be used for the typical passenger, incapacitated passenger, common adaptive ski equipment (e.g., SMB's), and non-ambulatory passengers;
i) provisions for communication with the evacuation teams;
j) provisions for suspending the evacuation in the event that the aerial lift is made operable during the evacuation;
k) provisions for control and assistance of evacuated persons until released;
l) provision for emergency lighting for evacuations that occur in or may extend into the hours of darkness; and
m) provisions for a post-evacuation report.

[92] Text is quoted from ANSI B77.1-2022, 3.3.2.5.7 Evacuation.

The Evacuation Plan for the proposed Project would comply with the requirements of ANSI B77.1 as applicable to urban gondola systems and other applicable standards and requirements as determined by the City of Los Angeles, Metro, Cal/OSHA, and/or other appropriate agencies during the permitting process for the proposed Project.

Safety and Security of Gondolas and Similar Aerial Systems

As discussed in Section 2.2, ART Background, in Section 2.0, Project Description, of the Draft EIR, forms of aerial transit technology have been available and utilized for the last 100 years. Modern applications have seen the evolution of aerial transit technology as a feasible and safe mode of urban rapid transit. In addition to the numerous urban aerial transit systems referred to in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, one of the most widely known examples of aerial transit can be found in the thousands of aerial ropeways in ski areas across North America. At five times safer than an elevator, gondolas and other aerial systems are exceptionally safe and secure modes of transportation.[93] Refer also to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable urban aerial transit systems in cities around the world operate safely, efficiently, and in concert with their surrounding urban environments.

As discussed in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station during operations, and operators in the control room would monitor activity throughout the proposed Project during both operational and non-operational hours.

During operational hours, all stations would be staffed by trained personnel with the ability to prevent individuals from causing damage to the system and communicate concerns to law enforcement or the operator booth. During non-operational hours, Dodger Stadium Station would be staffed with personnel performing maintenance and other activities, and operators in the control room would monitor activities throughout the proposed Project.

The proposed Project would include the following, additional safety and security measures:

- Access-restricting Design – As proposed, stations, junction, and tower would have limited, controllable access to critical areas and components. Towers would be designed to prevent climbing, and access ladders needed for authorized employees would be located inside the towers behind locked maintenance doors. Stations would have gates and other barriers that prevent physical access to equipment within. Additional layers of security including locked doors and

[93] National Ski Areas Association, NSAA Ski Lift Safety Fact Sheet (2016).

gates within the restricted areas would prevent trespassing and enable the operator to coordinate the applicable response from security personnel.

- Alarms – With access limited to particular routes, doors or other access points could be alarmed to signal their opening. Motion detectors could be used to indicate when unauthorized activity is present in restricted areas.
- Active Monitoring and Training – Multiple cameras and other technology could provide visibility to and information about locations across the system. By combining training, local familiarity, alarms and other data, staff would have the situational awareness to understand and respond to unauthorized activity.

TOPICAL RESPONSE K
Signage and Lighting

Comments on the Draft EIR address the Project's proposed signage as well as lighting. The Draft EIR addressed signage and lighting in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment, of the Draft EIR.

Proposed Signage

As discussed, in Section 2.0, Project Description, of the Draft EIR, similar to other transit projects that incorporate signage, the proposed Project would include signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage. Private funding for the proposed Project is anticipated to be supported by naming rights and sponsorship revenues, and such sponsors would be recognized in Project signage, which would be designed consistent with applicable Metro, City, and State approval requirements. Further, all signage for the proposed Project would require approvals from applicable agencies.

A Sign Concept Plan for the proposed Project was included in Appendix B of the Lighting Study, which is included as Appendix C to Appendix C, Visual Impact Assessment, of the Draft EIR. The Sign Concept Plan includes renderings of the Alameda Station, Alameda Tower, and gondola cabins showing the proposed signage. In addition, the Sign Concept Plan includes detailed drawings showing the proposed location for each sign and a signage schedule that provides:

- sign numbers;
- sign types;
- information on whether the sign is static or digital;
- information on whether the sign is illuminated or non-illuminated;
- sign design, e.g., platform mounted, hanging, wall-mounted, wrap, etc.;
- information on whether the sign is interior or exterior facing;
- sign area including the width and height; and
- description of each sign.

The Sign Concept Plan provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing approximately 61,189 square feet of signage, which would include approximately 59,889 square feet of static signage and approximately 1,300 square feet of digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. At the Alameda Station and the Dodger Stadium Station, the proposed Project proposes 400 square foot digital signs that would be interior facing for transit riders (for a total of 800 square feet, for one sign at the Alameda Station and one sign at the Dodger Stadium Station). The additional digital square footage is proposed as smaller freestanding digital displays that would be designed to activate the pedestrian environment. One would be located at Alameda Station with four located along the pedestrian connection between Dodger

Stadium Station and Dodger Stadium. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

The proposed signage program is an important component of the proposed Project to support wayfinding, transit connection, and funding for the proposed Project. The type and extent of the permitted signage would support the transit use and reflect that the proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at Los Angeles Union Station ("LAUS"). Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes Key Observation Points (KOPs) updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study included in Appendix C, Visual Impact Assessment, of the Draft EIR. As discussed in Appendix C, Visual Impact Assessment, of the Draft EIR, and Section 5.0, Corrections and Additions, of the Final EIR, based on the supplemental KOPs prepared to support evaluation of the potential impacts of the proposed Project on aesthetic and visual resources, including to incorporate the proposed Project's signage program and clarify design elements of the proposed Project, the conclusion that the proposed Project would not have a significant impact to aesthetic and visual resources remains unchanged.

As discussed in Appendix C, Visual Impact Assessment, to the Draft EIR, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. In addition, consistent with the City's Framework Element Chapter 5 Urban Form and Neighborhood Design Policy 5.8.4, signage would also be designed to be integrated with the architectural character of the surrounding buildings to convey a visually attractive character. Further, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, the type and extent of proposed signage would emphasize the transit use of the proposed Project and would complement the existing and approved signage environment along the proposed Project alignment. The proposed Project's signage would create a uniform visual identity that would connect the entire proposed Project alignment.

Sign District and Sign Regulations

As discussed on page 2-62, in Section 2.0, Project Description, of the Draft EIR it is anticipated that the proposed Project would seek a Sign District to establish a comprehensive set of sign regulations for the proposed Project consistent with applicable City requirements. The Sign District would provide limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs.

Regarding sign content, Los Angeles Municipal Code Section 14.4.4 prohibits signs that contain obscene matters, as defined in Section 311 of the Penal Code of the State of California. Outside of the prohibition

on obscene matters, signs have free speech protections under the First Amendment of the United States Constitution, and, accordingly, sign regulations are generally content-neutral and instead focus on time, place, and manner regulations. As noted above, the proposed Project's signage would be designed to be consistent with Metro requirements, including Metro's Advertising Content Guidelines, as applicable, which are updated from time to time.[94] Metro's Advertising Content Guidelines include a number of restrictions on advertising including prohibiting the advertising of all alcohol, tobacco, and cannabis products services and events. Metro's Advertising Content Guidelines also provide that advertising may not be displayed if its content involves: illegal activity; violence; demeaning or disparaging matter; vulgarity; obscene matter; adult entertainment and content; political endorsements; religion, negative connotations of public transit; unsafe transit behavior; content injurious to Metro's interests; or content harmful or disruptive to the transit system.

Lighting

As discussed on pages 3.1-52 and 3.1-53, in Section 3.01, Aesthetics, of the Draft EIR, Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and potential mobility hubs would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction.

The Lighting Study analyzed the proposed Project's potential environmental impacts resulting from the Project's lighting and illuminated signage program with respect to light trespass and glare. The proposed Project's lighting design is detailed in Appendix A: Building Lighting Concept Plan of the Lighting Study and the proposed Project's illuminated signage design is detailed in Appendix B, Sign Concept Plan, of the Lighting Study. The Lighting Study analyzed the proposed Project for compliance with the Los Angeles Municipal Code, CALGreen, the Cornfield Arroyo Seco Specific Plan ("CASP"), the River Improvement Overlay (RIO) District, and the California Vehicle Code and determined that the proposed Project's impacts with respect to light trespass and glare would be less than significant.

Los Angeles State Historic Park

The Lighting Study analyzed the entire proposed Project alignment, including the Los Angeles State Historic Park. The analysis of trespass impacts to the Los Angeles State Historic Park is reflected in the analysis at VP-S4 and detailed on pages 41- 42 and 44-48 of the Lighting Study, and the analysis of glare impacts to the Los Angeles State Historic Park is reflected in the analysis at M4 and detailed on pages 49-53 of the Lighting Study. As detailed in the Lighting Study, light trespass and glare impacts to the Los Angeles State Historic Park would be less than significant.

Cabin Interior

As discussed on page 55 of the Lighting Study (and in Appendix A, Building Lighting Concept Plan, of the Lighting Study), the lighting for the proposed Project was designed to provide the necessary illumination for passengers to safely board and enjoy the proposed Project. As explained in the Building Lighting

[94] Metro's Advertising Content Guidelines are accessible at https://www.metro.net/about/advertising-sponsorships-filming.

Concept Plan, the illuminance design standards for the proposed Project were developed in accordance with the California Electric Code, the Illuminating Engineering Society (IES) recommendations and transit system operation standards prepared in coordination with the proposed Project's lighting, design, and gondola systems technical consultants. As it relates to the cabins, page 56 of the Lighting Study indicates that the basis of design for cabin lighting is a 5 footcandle average at the floor and a 2 footcandle minimum in the cabin. As explained on page 68 of the Lighting Study, this cabin lighting level was selected to ensure that the cabins would provide a comfortable and safe interior illumination. As further detailed on page 68 of the Lighting Study, the light source for the cabins includes concealed low level linear lights, as well as downlighting that would be used to increase the cabin lighting levels during loading and unloading and in emergency situations. These light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems.

TOPICAL RESPONSE L
Project Sponsor and Proposed Project Costs and Financial Analysis

Comments on the Draft EIR address or raise questions regarding the Project Sponsor and how the proposed Project would be funded. Because comments regarding the Project Sponsor and how the proposed Project would be funded do not raise substantive issues on the content of the Draft EIR, no further response is required by CEQA. Nevertheless, this topical response provides the following information.

The Project Sponsor, LA Aerial Rapid Transit Technologies LLC ("LA ARTT LLC"), was originally a subsidiary of Aerial Rapid Transit Technologies LLC ("ARTT LLC"). ARTT LLC has donated LA ARTT LLC and the proposed Project to Zero Emissions Transit ("ZET"). ZET is a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Section 4.0, Costs and Financing, of the Final EIR provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the Project. The proposed Project is not seeking Metro funding. In addition, no other public sources of funding have been sought or committed to the proposed Project.

Project Sponsor

In 2018, the proposed Project was proposed by Aerial Rapid Transit Technologies LLC ("ARTT LLC"), an entity created by McCourt Global. The Project Sponsor, LA Aerial Rapid Transit Technologies LLC ("LA ARTT LLC"), was originally a subsidiary of ARTT LLC. ARTT LLC has donated LA ARTT LLC and the proposed Project to Zero Emissions Transit ("ZET"), a nonprofit and supporting organization to Climate Resolve, a California nonprofit public benefit corporation. ZET's purposes include promoting and supporting zero emissions transportation initiatives and other efforts to reduce greenhouse gas (GHG) emissions in the transportation sector and to mitigate and adapt to changes in weather and climate. These organizational purposes and activities include collaborations to champion equitable climate solutions, working on easier and safer ways to get around Los Angeles that also reduce GHG emissions, and advocating for mobility options that are sustainable, safer, and improve public health by investing in better transit and safer active transportation options for Los Angeles. To this end, ZET plans to identify and support zero-emission transportation initiatives and other projects, programs, and policies that will mitigate climate change, including the proposed Project.

ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise, including to reimburse Metro in its role as the Lead Agency for the EIR and funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR includes AECOM as to Draft EIR preparation and several environmental issue areas, including as to archaeology, paleontology, biological resources, geological resources, hydrology and water quality, and noise and acoustics; Kimley-Horn as Final EIR preparation and several environmental issues areas, including archeology, noise, and utilities; Fehr & Peers as to transportation; ENGEO Incorporated as to geology and soils; GPA Consulting, Teresa Grimes, and Historic Resources Group as to historical resources; Ramboll US Consulting, Inc. as to air quality/HRA, energy, and greenhouse gas

emissions; AES as to noise and vibration; Reax Engineering Inc. as to wildfire; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; Nabih Youssef Associates Structural Engineering as to structure engineering; Johnson Fain and SCJ Alliance as to Planning; RIOS as to design; Francis Krahe & Associates, Inc as to lighting; Carlberg Associates as to trees; and VMC LLC as to airspace analysis.

Costs and Financial Analysis

Section 4.0, Costs and Financing, of the Final EIR, provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding. The proposed Project's capital costs to construct are estimated at $385 – 500 million and assume prevailing wages pursuant to a Project Labor Agreement. The primary source of capital funding for the proposed Project is from bond financing serviced by revenue from the proposed Project. The primary sources of revenue for the proposed Project are farebox revenues and naming rights sponsorship revenue. Proposed Project annual operations and maintenance costs are projected at approximately $8 – 10 million per year (inclusive of capital reserve funds) and assume prevailing wages. Operation and maintenance costs are proposed to be fully funded out of proposed Project revenues.

The proposed Project is not seeking Metro funding. In addition, no other public sources of funding have been sought or committed to the proposed Project.

TOPICAL RESPONSE M
Comparable Urban Aerial Transit Systems

Comments on the Draft EIR address other urban aerial transit systems around the world. The Draft EIR discusses numerous aerial transit systems in other locations around the world that serve as precedents for the proposed Project. Like the proposed Project, comparable aerial transit systems have been shown to operate safely and efficiently and provide benefits to their surrounding communities.

Comparable Systems Enable Faster Transit and Facilitate Commerce

As discussed in Section 2.0, Project Description, of the Draft EIR, modern aerial transit systems are currently in operation in numerous urban locations around the world. These locations range from cities within the United States—e.g., Portland, Oregon and New York, New York—to cities in Asia, Europe, and South America. Such comparable systems demonstrate the versatility of aerial transit systems to operate in diverse environments and represent a sample of the numerous models for the proposed Project.

Comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety. As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a 3S aerial gondola system opened in 2022 in Toulouse, France ("Téléo") and is currently operating along a 1.67-mile segment. With a cabin size of 34 people, the Toulouse system has a capacity of transporting 2,000 people per hour per direction and a ride time of 10 minutes. Annual ridership of Téléo is estimated to be 2.5 million people. Téléo connects three major economic and educational hubs of the city: Rangueil Hospital, the University Cancer Institute, and Paul Sabatier University.[95] The total employment across these three institutions represents 85,000 people.[96] Moreover, the aesthetic design of Téléo has received accolades for its integration with and enhancement of the surrounding environs, including approval by the French architectural association Bâtiments de France.[97]

Recently, the "Burnaby Mountain Gondola" was proposed in British Columbia, Canada. The Burnaby Mountain Gondola is a 3S aerial gondola system proposed to connect Simon Fraser University with TransLink, the statutory authority responsible for the regional transportation network of Metro Vancouver in British Columbia, Canada. Located in British Columbia's third-largest city and a municipality of Metro Vancouver, the Burnaby Mountain Gondola is expected to bring transportation and commercial benefits to the surrounding area. Simon Fraser University represents a major employment and economic hub in the region, and approximately 25,000 trips are made up and down Burnaby Mountain each day.[98] During peak periods, the Burnaby Mountain Gondola would depart approximately every minute and transport approximately 3,000 passengers per hour per direction.[99] Whereas currently the average length of a bus trip is between 15 and 45 minutes, the travel time on the Burnaby Mountain Gondola would be

[95] Poma. 2021. Téléo. Available at: https://www.poma.net/en/work/teleo (accessed September 20, 2023).
[96] Ibid.
[97] Seilbahnen International. 2022. "THE FRENCH CITY TOULOUSE NOW HAS AN URBAN 3S CABLE CAR." Available at: https://www.simagazin.com/en/si-urban-en/the-french-city-toulouse-now-has-an-urban-3s-cable-car (accessed September 20, 2023).
[98] Translink. Burnaby Mountain Gondola. Available at: https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola (accessed September 20, 2023).
[99] Translink. 2021. Burnaby Mountain Gondola: Route Selection Report. Available at: https://www.translink.ca/-/media/translink/documents/plans-and-projects/rapid-transit/burnaby-mountain-gondola/route-selection-report/route-selection-report.pdf#view=fitH (accessed September 20, 2023).

approximately six minutes.[100] Like the proposed Project, the Burnaby Mountain Gondola would thus enable shorter travel times for commuters and nearby residents, more frequent service, and reduced noise, traffic, and emissions for the surrounding communities.[101]

In Utah, the Utah Department of Transportation ("UDOT") released a Final Environmental Impact Statement ("Final EIS") in August 2022 for an integrated transportation system in Little Cottonwood Canyon, Utah.[102] In the Final EIS, UDOT selected an aerial gondola system (the "Little Cottonwood Canyon Gondola") as the preferred alternative for the transportation system. Located in a mountainous region popular for skiing, the Little Cottonwood Canyon Gondola would improve mobility along State Route (S.R.) 210 and would substantially improve average travel time from 80-85 minutes by car to 43 minutes by gondola.[103] Due to the risk of avalanches in the area, road closures for avalanche mitigation are frequent, causing up to four-hour travel delays along S.R. 210 and spillover traffic in nearby neighborhoods.[104] Like the proposed Project, the Little Cottonwood Canyon Gondola would thus provide benefits to local residents in offering an alternative mode of transportation along S.R. 210 for visitors, alleviating spillover traffic, easing parking burdens, and improving air quality in nearby communities.

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, in Bolivia, a monocable detachable gondola system ("Mi Teleférico") connects La Paz to neighboring cities, including the mountaintop city of El Alto. With a capacity of 3,000 people per hour per direction, Mi Teleférico transports more than 230,000 people per day across its entire network and routinely operates at its peak design capacity during commuting hours between 7:00 and 9:00 A.M.[105] Mi Teleférico reduces trip times from over one hour by car to 10-17 minutes by cable car.[106] In addition, the system components of Mi Teleférico have been hailed for their ability to integrate seamlessly into the densely populated environment of La Paz, due to their compact size relative to those of other modes of public transit.[107]

In Mexico, an aerial transit system ("Cablebus") operates along a 5.7-mile alignment in northern Mexico City. Across 377 cabins carrying up to 10 passengers each, Cablebus can transport as many as 5,000 people per hour between its six stations.[108] The Cablebus system has been reported to reduce travel times in Mexico City from as much as 50 minutes by car to 19 minutes by aerial transit.[109] More recently, an expansion of the Cablebus system ("Cablebus 2") began operations in 2021 in southeastern Mexico City, located in the district of Iztapalapa. Operating over nearly seven miles, Cablebus 2 can carry as many as

[100] Translink. Burnaby Mountain Gondola. Available at: https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola (accessed September 20, 2023).
[101] City of Burnaby. 2019. Burnaby Mountain Gondola Transit Project Report. Available at: https://pub-burnaby.escribemeetings.com/filestream.ashx?DocumentId=43307 (accessed September 20, 2023).
[102] Utah Department of Transportation. Little Cottonwood Canyon Environmental Impact Statement. Available at: https://littlecottonwoodeis.udot.utah.gov (accessed September 20, 2023).
[103] Utah Department of Transportation. Little Cottonwood Canyon EIS: Project Overview and Final EIS Alternatives Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2022/08/LCC_FEIS_00b_Summary.pdf (accessed September 20, 2023).
[104] Utah Department of Transportation. Little Cottonwood Canyon EIS: Executive Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2022/08/LCC_FEIS_00b_Summary.pdf (accessed September 20, 2023).
[105] Doppelmayr/Garaventa. 2023. Utilization: Linea Morada Section 1.
[106] CNBC. 2018. "How cable-car systems are revolutionizing public transport almost 12,000 feet above sea level." Available at: https://www.cnbc.com/2018/12/07/how-cable-car-systems-are-revolutionizing-public-transport-in-la-paz.html (accessed September 20, 2023).
[107] Ibid.
[108] Techxplore. 2021. "Commuters escape Mexico City gridlock in new cable car." Available at: https://techxplore.com/news/2021-07-commuters-mexico-city-gridlock-cable.html (accessed September 20, 2023).
[109] Leitner. 2021. "Cablebus 2 Gondola Lift in Mexico City Now Ready for Operation." Available at: https://www.leitner.com/en/company/news/detail/cablebus-2-gondola-lift-in-mexico-city-now-ready-for-operation (accessed September 20, 2023).

50,000 people per day over seven stations.[110] Travel times via Cablebus 2 are similarly reduced by a significant margin, from up to one hour and 15 minutes by car to 36 minutes by aerial transit.[111]

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a monocable detachable gondola ("Mexicable") operates along a 3-mile distance in Mexico City, Mexico. With a cabin size of 10 people, the annual ridership of Mexicable is estimated to be 7.3 million. Mexicable serves to connect the hillside municipality of Ecatepec to the broader Mexico City Metro public transit system.[112] Passengers of Mexicable are able to bypass the significant vehicle traffic near the Mexico-Pachuca highway, reducing travel times to 17 minutes by aerial transit from upwards of 90 minutes by car.

In Colombia, an aerial transit system ("Metrocable") operates throughout a network that connects the innermost areas of Medellín to communities lying in the hillsides of the Aburrá Valley. Metrocable comprises an integral part of Medellín Metro, the city's public transportation system, serving residents who commute to and from Medellín's city center.[113] Since its initial opening in 2004, Metrocable has reduced travel times throughout the city dramatically, from as much as two hours by car to 30 minutes by aerial transit.[114] Moreover, by making transportation more accessible to outlying, disadvantaged communities, Metrocable has been found to enable greater job access, which in turn has led to higher incomes for residents with access to the Metrocable system.[115]

In Bogotá, Colombia, an aerial transit system ("TransMiCable") operates along a 2-mile route that connects the Ciudad Bolivar District to Bogotá's Integrated Public Transport System, the city's public transportation system.[116] With a capacity of 3,600 people per hour per direction, TransMiCable has one of the highest capacities among aerial transit systems around the world, reducing travel times for the approximately 20,000 daily passengers from up to one hour and 20 minutes by bus to 15 minutes by aerial transit.[117,118] Local businesses have also benefited from the increased flow of customers, and new businesses have sprouted up as a direct result of the increased foot traffic near TransMiCable stations.[119]

Like such systems, the proposed Project would enable faster transit and facilitate commerce for businesses and consumers along the system alignment. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Just as comparable systems such as Mi Teleférico are able to operate at peak capacity during commuting hours, the proposed Project would be able to operate at its peak design

[110] Ibid.
[111] The Gondola Project. 2021. "Cablebus 2 Gondola Lift in Mexico City Officially Opens." Available at: https://www.gondolaproject.com/2021/08/17/cablebus-2-gondola-lift-in-mexico-city-officially-opens (accessed September 20, 2023).
[112] ParCitypatory. 2019. "Connecting the Outskirts to City Centre with Cable Cars." Available at: https://parcitypatory.org/2019/06/08/mexicable (accessed September 20, 2023).
[113] Axios. 2023. "Medellín and the power of public transportation." Available at: https://www.axios.com/2023/02/07/medellin-mass-transit (accessed September 20, 2023).
[114] Ibid.
[115] Mihoko Matsuyuki, et al. 2020. Impact of aerial cable car in low-income area in Medellín, Colombia. Available at: https://www.sciencedirect.com/science/article/pii/S2352146520305676 (accessed September 20, 2023).
[116] The Gondola Project. 2018. "Colombian Capital Opens First Urban Gondola." Available at: https://www.gondolaproject.com/category/installations/transmicable (accessed September 20, 2023).
[117] Ibid.
[118] International Finance Corporation. 2020. A Cable Car Named Development. Available at: https://www.ifc.org/wps/wcm/connect/news_ext_content/ifc_external_corporate_site/news+and+events/news/cm-stories/bogota-cable-car (accessed September 20, 2023).
[119] Ibid.

capacity on game days and during other events at Dodger Stadium. Given the capacity of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system, which is equal to roughly 1,000,000 passengers per year at Dodger Stadium alone. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Further, in creating a new transit connection, the proposed Project would bolster commercial activity in the surrounding areas. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to, and opportunities for potential partnerships with, local businesses.

Comparable Systems Promote Public Art

Like the proposed Project, comparable urban aerial transit systems promote the creation of public art and enable opportunities for cities to collaborate with local artists to beautify their neighborhoods. In Ecatepec, Mexico City, the Mexicable has galvanized the creation of as many as 52 works of street art and sculptures surrounding the system's alignment. Like the proposed Project, Mexicable enabled collaborations with numerous local and international artists to design public art that now line the system's route to be viewed by passengers and local residents alike.[120] With the proliferation of public art along the Mexicable alignment, residents and local businesses have reported greater numbers of visitors and a renewed interest in Ecatepec.[121] Likewise, along the route of Cablebus 2, the Iztapalapa local government has hired as many as 140 local artists to enliven the neighborhood with color, commissioning nearly 7,000 largescale pieces of public art and paintings.[122] Colorful murals have been painted on the sides of buildings and on rooftops, making them visible to pedestrians on the ground as well as passengers in the air.[123] Refer to Topical Response C, Project Features, for discussion of the proposed Project's commitment to provide opportunities to collaborate with and showcase local artists along the system alignment.

Comparable Systems Increase Safety and Reduce Crime

Other gondola systems around the world have been shown to reduce violent crime in nearby areas. In Medellín, Colombia, a study of the city's MetroCable, an urban gondola system, showed that transit-oriented development around the system was accompanied by investments in neighborhood infrastructure.[124] Such investments were in turn associated with a 66-percent decline in the homicide rate and a 75-percent decline in resident reports of violence in neighborhoods with access to the system, demonstrating that investments in aerial transit systems can contribute to a reduction in violent crime.[125]

In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. In Bolivia,

[120] The Gondola Project. 2016. Mexicable Murals: Mexico's First Urban Cable Car. Available at: https://www.gondolaproject.com/2016/08/31/mexicable-murals-mexicos-first-urban-cable-car (accessed September 20, 2023).
[121] The New York Times. 2016. "Near Mexico City, Cable Car Lets Commuters Glide Over Traffic." Available at: https://www.nytimes.com/2016/12/28/world/americas/mexico-city-mexicable.html (accessed September 20, 2023).
[122] The New York Times. 2021. "Frida Kahlo, Aztec Gods: Can Art Lift Up a Poor Neighborhood?" Available at: https://www.nytimes.com/2021/10/14/world/americas/mexico-city-iztapalapa-murals.html (accessed September 20, 2023).
[123] Ibid.
[124] Magdalena Cerda, et al. 2012. Reducing violence by transforming neighborhoods: a natural experiment in Medellín, Colombia. Available at: https://pubmed.ncbi.nlm.nih.gov/22472117 (accessed September 20, 2023).
[125] Ibid.

residents of La Paz have expressed that Mi Teleférico is safer than local minibuses, as the latter are frequently packed to capacity with passengers, which often include pickpockets.[126] Similarly, regular passengers of the Cablebus in Mexico City have reported that despite high incidents of theft in public transportation, they experience a greater sense of security when riding the Cablebus and thus prefer it to other transit modes.[127] And in Ecatepec, residents have expressed similar preferences to taking Mexicable over buses given how frequently bus passengers become victim to crime in the area.[128]

In line with such comparable systems, as discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would be equipped with security features to ensure the safety of passengers. Each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed.

Comparable Systems Operate Safely, Efficiently, and in Concert with Adjacent Residential, Schools, and Open Space

Comments on the Draft EIR address the proximity of the proposed Project to houses, schools, and open space. Comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with their surrounding urban environments.

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, the Portland Aerial Tram in Portland, Oregon connects nearby medical office buildings and high-rise residential uses to the Oregon Health and Science University (OHSU) and the OHSU Hospital, operating between terminals located at Portland's South Waterfront District and Marquam Hill. The Portland Aerial Tram flies over the residential neighborhood of Lair Hill, which is home to the South Portland Historic District, a historical residential neighborhood.[129] The Portland Aerial Tram has also provided community benefits to the surrounding area, including bike-share and mobility improvements and a pedestrian bridge connecting the Lair Hill neighborhood to South Waterfront. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

The Portland Aerial Tram is also one of numerous aerial transit systems that operate safely in seismically active areas. Aerial transit systems routinely operate in areas with regular earthquake activity, including North American cities such as Mexico City, Mexico, South American cities such as Quito, Ecuador and Bogota, Colombia, and European and Asian cities such as Ankara and Istanbul, Türkiye. Refer to

[126] NPR. 2014. "High in the Andes, Bolivia's Gondolas in the Sky Ease Congestion." Available at: https://www.npr.org/sections/parallels/2014/10/22/358046982/high-in-the-andes-bolivias-gondolas-in-the-sky-ease-congestion (accessed September 20, 2023).

[127] Mexico News Daily. 2022. "Passenger numbers on Mexico City Cablebus line 78% more than expected." Available at: https://mexiconewsdaily.com/news/passenger-numbers-on-mexico-city-cablebus-line-78-more-than-expected (accessed September 20, 2023).

[128] WBUR. 2017. "An Aerial Tram Is One Mexican City's Solution To Traffic And Crime." Available at: https://www.wbur.org/hereandnow/2017/04/26/mexico-ecatepec-aerial-tram (accessed September 20, 2023).

[129] Portland Aerial Tram. Available at: http://www.gobytram.com (accessed September 20, 2023).

Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, to ensure structural integrity and safety.

In Mexico City, both the Mexicable and Cablebus aerial transit systems transport passengers above dense, residential areas.[130] In addition to homes and residential neighborhoods, the alignment of Mexicable also covers various nearby schools and educational facilities, servicing students who use the aerial transit system to commute to and from school.[131] In Bogotá, the TransMiCable system is woven seamlessly into the fabric of the densely populated city and surrounding hillside communities. System components, including stations, are nestled among homes and public open space, and public parks have been newly built in close proximity to TransMiCable stations.[132] In Colombia, MetroCable flies above the densely populated, mountainous city of Medellín. Moreover, as discussed above, it is due to MetroCable's close proximity to residential areas that access to economic opportunities has grown and individual incomes have risen in even the poorest areas of the city.[133] In Bolivia, the alignment of Mi Teleférico passes through the densest parts of La Paz and El Alto, flying above countless residences and over public parks.[134] In Toulouse, Téléo is located alongside a hospital (Rangueil Hospital), a university (Paul Sabatier University), and numerous nearby residences. Indeed, the express purpose of Téléo was to make these sites easily accessible to one another by transit. Likewise, the Burnaby Mountain Gondola would be located nearby a university (Simon Fraser University) and a residential community of 7,000 people, expected to rise to 9,000 people in the coming years.[135] Like Téléo, the Burnaby Mountain Gondola was conceived to serve the express purpose of providing access to these sites and enable convenient connections between the residences and employers along the system's alignment. Finally, as shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a reversible tramway operates along a half-mile alignment in New York, New York, connecting Manhattan to Roosevelt Island ("Roosevelt Island Tramway"). The Roosevelt Island Tramway is located in close proximity to numerous residences and is visible from the inside of homes on both ends of the alignment.

Consistent with these precedent systems, the proposed Project would operate safely, efficiently, and in concert with the surrounding urban environment of the City of Los Angeles.

[130] Leitner. Mexico: A New Chapter in the "Ropeway Success Story." Available at: https://www.leitner.com/en/company/news/detail/mexico-a-new-chapter-in-the-ropeway-success-story (accessed September 20, 2023).
[131] ParCitypatory. 2019. "Connecting the Outskirts to City Centre with Cable Cars". Available at: https://parcitypatory.org/2019/06/08/mexicable (accessed September 20, 2023).
[132] International Finance Corporation. 2020. A Cable Car Named Development. Available at: https://www.ifc.org/wps/wcm/connect/news_ext_content/ifc_external_corporate_site/news+and+events/news/cm-stories/bogota-cable-car (accessed September 20, 2023).
[133] Mihoko Matsuyuki, et al. 2020. Impact of aerial cable car in low-income area in Medellín, Colombia. Available at: https://www.sciencedirect.com/science/article/pii/S2352146520305676 (accessed September 20, 2023).
[134] CleanTechnica. 2014. "The World's Longest Aerial Cable Car System." Available at: https://cleantechnica.com/2014/10/05/the-worlds-longest-aerial-cable-car-system-bolivias-mi-teleferico (accessed September 20, 2023).
[135] Translink. Burnaby Mountain Gondola. Available at: https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola (accessed September 20, 2023).

TOPICAL RESPONSE N
Environmental Justice

Comments on the Draft EIR suggested that the Draft EIR should have addressed environmental justice. Environmental justice ensures equal and equitable protection from environmental and health hazards, meaning that the burdens of pollution should not be borne by sensitive populations or communities that are already experiencing its adverse effects. The Draft EIR addressed topics related to environmental justice, including the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution. The Draft EIR also considered and analyzed the proposed Project's consistency with land use policies related to environmental justice. The proposed Project also supports Metro's goal of prioritizing equity opportunities as demonstrated by the proposed Project's goals which include helping to promote public transit as an essential lever to enabling access and improving quality of life for Los Angeles County. Consistent with the recognition by the California Attorney General that compliance with CEQA itself is a tool to promote environmental justice, the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities.

Environmental Justice and the Draft EIR

Poor and marginalized communities, including communities of color, are disproportionately affected by environmental degradation, with hazardous waste facilities and other polluting industries placed inequitably near these communities. Within the United States, race is the primary determinant of environmental justice, and is recognized by the environmental justice movement as "environmental racism." Communities of color have been battling environmental racism for decades. For example, the practice of "redlining" led to communities of color being located in areas with high levels of pollution and environmental hazards. Projects such as the proposed Project, and other investments that seek to reduce pollution within these communities disproportionately impacted by pollution, are important tools in combating environmental racism. The proposed Project – a zero-emission, high-capacity transit connector – would result in air quality benefits for the surrounding communities and would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways, benefitting these communities.

The Draft EIR Addresses Environmental Justice by Considering the proposed Project's Ability to Reduce Congestion and Emissions from On-Road Vehicles in an Area Disproportionately Burdened by Pollution

As the California Attorney General recognizes, environmental justice ensures equal and equitable protection from environmental and health hazards, meaning that the burdens of pollution should not be borne by sensitive populations or communities that are already experiencing its adverse effects.[136] The California Attorney General's Office acknowledges that compliance with CEQA is a tool to promote environmental justice.[137] The Draft EIR complied with CEQA, and addressed topics related to environmental justice, including an analysis of the proposed Project's potential impacts to the surrounding

[136] State of California Department of Justice, Environmental Justice, https://oag.ca.gov/environment/justice (accessed September 20, 2023).
[137] Ibid.

communities, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

As discussed in Section 2.0, Project Description, of the Draft EIR, "the communities in the vicinity of the proposed Project alignment were identified as being in the 90 – 100 percentile of communities disproportionately burdened by multiple sources of pollution in the State." The proposed Project itself would not exacerbate such burdens, but would provide benefits to these communities. The proposed Project – a zero-emission, high-capacity transit connector – would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways, benefitting these communities.

The proposed Project would also result in air quality benefits to communities in the Project area. As discussed in Section 1.4.3, Senate Bill 44, of Section 1.0, Introduction, of the Draft EIR, the lifetime emissions of the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of 166,653 MT CO2e. In the same section, the Draft EIR notes that the lifetime VMT reduction of the proposed Project over its useful life would be 129,629,500 VMT. As discussed in Section 3.03, Air Quality, of the Draft EIR, emissions are decreased through reducing vehicle miles traveled, and the "proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions."

While not applicable to the proposed Project, the proposed Project is consistent with President Biden's recent Executive Order on Environmental Justice.[138] The Executive Order provides that "[a]dvancing environmental justice will require investing in and supporting culturally vibrant, sustainable, and resilient communities in which every person has safe, clean, and affordable options for housing, energy, and transportation." The proposed Project is a proven, zero emission, safe, sustainable, high-capacity and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile[139] connector. The Executive Order also requires agencies to provide information in a manner that provides meaningful access to individuals with limited English proficiency and is accessible to individuals with disabilities, and to provide technical assistance, tools, and resources to assist in facilitating meaningful and informed public participation. As discussed in detail below, the proposed Project provided project information and outreach in multiple languages reflective of the communities in the Project area, provided ADA accessibility features in public meetings, and hosted eight public meetings immediately preceding, during, and immediately following the Draft EIR public review period to facilitate meaningful and informed public participation. In addition, in June 2021, the Project Sponsor also hosted virtual community meetings to provide Project updates and solicit feedback on the proposed Project, and provided information in various languages.

[138] The White House, Executive Order on Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023), available at: https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all (accessed September 20, 2023).

[139] Metro's First/Last Mile Policy is aimed at making it easier to travel in Los Angeles by strengthening connections between transit stations and their surrounding communities. https://www.metro.net/about/first-last (accessed September 20, 2023).

The Draft EIR Analyzed the Proposed Project's Consistency with General Plan Policies Related to Environmental Justice

While the City of Los Angeles has not adopted a separate Environmental Justice Element, the City's General Plan Framework Element establishes several health-promoting principles, including equity and environmental justice in such considerations. Similarly, the City's Mobility Element has a strong public health focus centered around promoting sustainability and increasing access to active transportation. As provided in Table 3.11-3, Project Consistency with Applicable City of Los Angeles General Plan Policies, of the Draft EIR, the Draft EIR analyzed the proposed Project's consistency with these policies. For example, as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project supports Framework Element Objective 5.8 by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements. Consistent with this objective, the Draft EIR notes how "[t]he proposed Project would also enhance community connectivity to areas that have historically been underserved and provide pedestrian enhancements so that the areas surrounding the stations can serve as a focus of activity for the surrounding community and a focus of investment in the community." Section 3.11, Land Use and Planning, of the Draft EIR, discusses how the proposed Project is consistent with Framework Element Policy 38, seeking to enhance neighborhood accessibility by "provid[ing] new connections to and between currently underserved neighborhoods and uses along the proposed alignment" while including a "mobility hub at the Chinatown/State Park Station where passengers would be able to access a suite of first mile and last mile multi-modal options, such as a bike share program." In addition to facilitating a potential bike share program, the proposed Project's cabins would accommodate bicycles, as described in Section 2.0, Project Description, of the Draft EIR. Further, the Chinatown/State Park Station location may provide bicycle access from the adjacent proposed Los Angeles River bicycle path (anticipated to open in 2027)[140] to the bicycle and hiking trails in Elysian Park.

The Draft EIR also analyzed the proposed Project's consistency with the City's Mobility Element in Section 3.17, Transportation. The proposed Project would ensure quality pedestrian access by facilitating "multi-modal access to and from the stations with pedestrian network improvements." Such improvements would be targeted especially at the areas surrounding the proposed Dodger Stadium Station to provide a safe and efficient connection for pedestrians traveling between the station and the stadium. The proposed Project would also provide quality pedestrian access to communities surrounding Dodger Stadium further advancing the environmental justice goals of the City's Mobility Element. A key policy initiative of the City's Mobility Element is to "embed equity and environmental justice into the transportation policy framework, project implementation, and action programs."[141] Because the proposed Project would bring quality pedestrian access to areas around Dodger Stadium that previously have lacked such access, the Draft EIR concluded that the proposed Project would be consistent with the policies of the City's Mobility Element to ensure the provision of quality pedestrian access.

[140] Los Angeles County Metropolitan Transportation Authority, LA River Path Project, https://www.metro.net/projects/lariverpath (accessed September 20, 2023).
[141] Los Angeles Department of City Planning, Mobility Plan 2035, p. 14 (2016), https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf#page=14 (accessed September 20, 2023).

The Proposed Project Supports Metro's Goal of Prioritizing Equity Opportunities

The proposed Project would be consistent with Metro's equity goals. Metro's Rapid Equity Assessment ("REA") is a tool designed to assist Metro staff in identifying and prioritizing equity opportunities. Metro's REA was developed in June 2020 to consider equity in urgent times, and assists Metro staff in quickly prioritizing equity opportunities, which enhance positive impacts or reduce negative consequences, and is used as a first step for Metro projects, programs, services, and decisions. Metro defines "equity" as "both an outcome and a process to address racial, socioeconomic, and gender disparities, to ensure fair and just access . . . to opportunities, including jobs, housing, education, mobility options, and healthier communities . . . [i]t requires community information and needs-based provisions, implementation, and impact of services, programs, and policies that reduce and ultimately prevent disparities."[142]

Consistent with Metro's Rapid Equity Assessment framework, the proposed Project seeks to support Metro's goal of prioritizing equity opportunities and will help promote public transit as an essential lever in enabling access to safe and sustainable transportation and improving quality of life for Los Angeles County.

Potential Benefits and Improving Equity Outcomes

Improved Transportation Connectivity in Metro's EFCs

The proposed Project would improve transportation connectivity in Metro's Equity Focused Communities (EFCs) where transportation needs are greatest.

Metro created a community designation called Equity Focus Communities (EFCs) to help identify where transportation needs are greatest. The proposed Project, which is located within the boundaries of Metro's EFCs, would help to improve transportation in EFCs. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project aims to enhance community connectivity in these EFCs by providing first/last mile transit and pedestrian access in areas that have historically been underserved, including Los Angeles State Historic Park and Elysian Park. The proposed Project is also consistent with Metro's First/Last Mile Strategic Plan to facilitate easy, safe, and efficient access to the regional transportation system because it would increase connectivity of people in the EFCs to the region's public transportation hub at LAUS and the Dodger Stadium property, and more broadly improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. In addition to facilitating transit connectivity, the proposed Project would also enhance access for riders of the ART system to parks, including Los Angeles State Historic Park and Elysian Park, thereby improving equitable access to parks. Metro also acknowledges that there is a need for improved transit options that link with the growing Metro network to meet existing and future travel demands and access to Dodger Stadium.

Therefore, as discussed in Section 2.3.8, Project Objectives, of the Draft EIR, the overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the

[142] Metro's Rapid Equity Assessment (REA), available here: https://www.dropbox.com/s/790jw2sumk42ra6/Rapid%20Equity%20Assessment%20Tool.pdf?dl=0 (accessed September 20, 2023).

Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed Project alignment and the region's rapidly growing regional transit system at LAUS.

Air Quality Benefits

The proposed Project would also reduce vehicular congestion in and around Dodger Stadium, thereby reducing VMT and GHG emissions and resulting in air quality benefits.

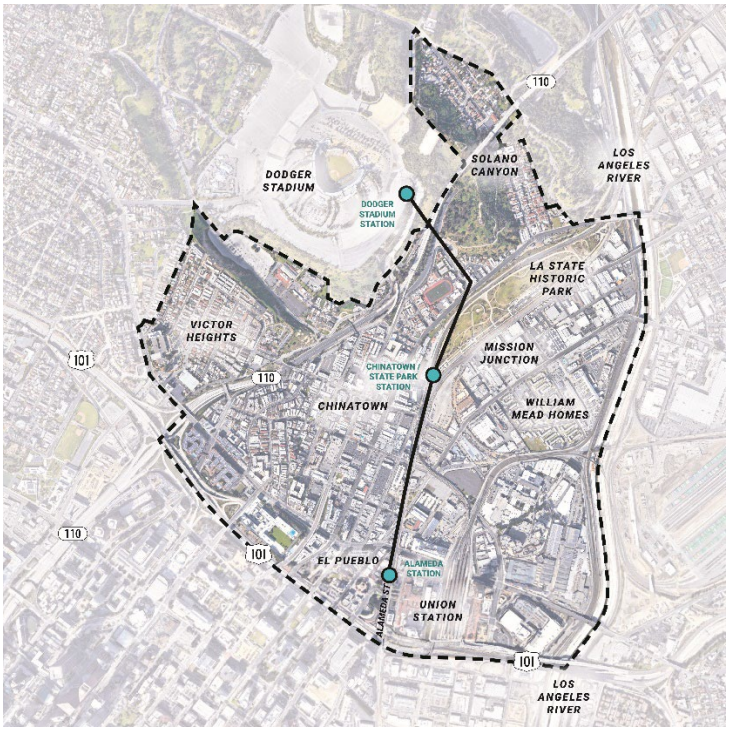
The proposed Project seeks to take into account the current needs of the surrounding community, including economic barriers and social challenges with access to transit by helping to reduce vehicular congestion and associated air pollution in the Project area. As discussed in Section 2.0, Project Description, of the Draft EIR, the communities in the vicinity of the proposed Project alignment were identified as being in the 90 – 100 percentile of communities disproportionately burdened by multiple sources of pollution in the state.[143] And, as the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue, unlike other high-capacity venues in the region. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Affordability – Community Access Plan

As reflected in the Project Objectives provided in Section 2.3.8 of the Draft EIR, the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. Some communities along the proposed Project alignment, including William Mead Homes, include families with a median household income of <$20,000 per year. To enhance access to the proposed Project for these communities, in addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The graphic below demonstrates the geographic area for the Community Access Plan applicability. Moreover, under the Community Access

[143] California Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 Map, http://oehha.ca.gov/calenviroscreen/maps-data.

Plan, transfers to and from the Metro regional transit system and the proposed Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). Residents and employees of businesses located within the communities adjacent to the proposed Project alignment would only pay the rate they pay to ride the Metro system to ride the proposed Project.



Accessibility – ADA Compliance

To ensure the proposed Project overcomes barriers to access due to physical inability, the proposed Project is designed to be ADA compliant. As discussed in Section 2.0, Project Description, of the Draft EIR, the station boarding process and cabins would allow for sitting or standing, and would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"), including accommodating wheelchairs. In addition, the length and sizing of the arrival/departure platforms within station would be compliant with the accessibility requirements of the ADA. If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow, or stop, a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall of system capacity of the proposed Project. Pathways to and from the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Open Space Enhancements, Active Transportation Connectivity, and Sustainability Features

The proposed Project also includes features to enhance and provide additional benefits to the surrounding communities. The proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements, drought tolerant landscaping, and improvements at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would also improve transit access to the Los Angeles State Historic Park and Elysian Park.

Safety and Security Features

As discussed in detail in Topical Response M, Comparable Urban Aerial Transit Systems, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with their surrounding environments. For example, in Mexico City, both the Mexicable and Cablebus aerial transit systems transport passengers above dense, residential areas.[144] In addition to homes and residential neighborhoods, the alignment of Mexicable also covers various nearby schools and educational facilities, servicing students who use the aerial transit system to commute to and from school.[145] Further, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Regular passengers of the Cablebus in Mexico City have reported that despite high incidents of theft in public transportation, they experience a greater sense of security when riding the Cablebus and thus prefer it to other transit modes.[146] And in Ecatepec, residents have expressed similar preferences to taking Mexicable over buses given how frequently bus passengers become victim to crime in the area.[147]

In line with such comparable systems, and as discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station, and a separate operator would be stationed in a control room to monitor activity throughout the proposed Project.

[144] Leitner, Mexico: A New Chapter in the "Ropeway Success Story." available at: https://www.leitner.com/en/company/news/detail/mexico-a-new-chapter-in-the-ropeway-success-story (accessed September 20, 2023).
[145] ParCitypatory, Connecting the Outskirts to City Centre with Cable Cars (2019), available at: https://parcitypatory.org/2019/06/08/mexicable (accessed September 20, 2023).
[146] Mexico News Daily, Passenger numbers on Mexico City Cablebus line 78% more than expected (June 21, 2022), https://mexiconewsdaily.com/news/passenger-numbers-on-mexico-city-cablebus-line-78-more-than-expected (accessed September 20, 2023).
[147] WBUR, An Aerial Tram Is One Mexican City's Solution To Traffic And Crime, (April 26, 2017), https://www.wbur.org/hereandnow/2017/04/26/mexico-ecatepec-aerial-tram (accessed September 20, 2023).

In addition, and as discussed in Topical Response K, Signage and Lighting, the proposed Project would include signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, and the proposed Project's lighting would include low-level lighting for security and wayfinding purposes.

Project Sponsor's Commitment to Utilizing MBE/WBE/DBE/SBE/DVBE/LGBTQ Owned Businesses[148]

The Project Sponsor has committed to a goal of 35 percent utilization of MBEs, WBEs, DBEs, SBEs, DVBEs, and LGBTQ-owned businesses during the proposed Project's construction phase.

Utilization of Local Artists to Reflect the Unique Neighborhood Culture and History

As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, each station of the proposed Project could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture. The proposed Project has also committed to one "Art Cabin" that could feature artwork commissioned from local artists. The proposed Project would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Overcoming Potential Burdens

The Proposed Project Would Not Displace Businesses

Comments on the Draft EIR address the need for housing, grocery stores, and/or healthcare facilities in the communities in the vicinity of the proposed Project alignment. The proposed Project would not preclude the development of such uses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. As discussed in Topical Response C, Project Features, during construction of the proposed Project, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including MBEs, WBEs, DBEs, SBEs, DVBE, and LBGTQ-owned businesses, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Further, as discussed in Section 3.17, Transportation, and Section 3.11, Land Use, of the Draft EIR, multimodal access—for both local and emergency response—to local businesses, neighborhoods,

[148] MBE/WBE/DBE/SBE/DVBE/LGBTQ refers to minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses.

LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized.

The Proposed Project Would Not Displace Housing

As discussed in Section 3.14, Population and Housing, of the Draft EIR, and Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, of the Final EIR, no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. The proposed Project is intended to accommodate existing and future transportation needs of the area's population. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, of the Final EIR, for an overview of the proposed Project's consistency with planned and proposed housing in the vicinity of the proposed Project. The proposed Project would therefore not preclude the development of such community-facing uses within the area.

Minimizing Aerial Rights Requirements

As discussed in Section 2.5, Proposed Project Alignment and Components, of Section 2.0, Project Description, of the Draft EIR, and illustrated in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses.

Addressing Privacy Concerns

Some commenters raise concerns about impacts to privacy of communities along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Community Outreach and Engagement Efforts

Metro and the Project Sponsor have conducted extensive community engagement efforts. As discussed in Appendix A, Scoping Report, of the Draft EIR and Appendix A, Public Outreach Report, of the Final EIR, these efforts include multilingual door knocking, provision of project materials and information in multiple languages, numerous public meetings with provision of materials and interpretation in multiple languages, and partnerships with various cultural, educational, and business community organizations, including Cathedral High School, the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants. Community engagement efforts also resulted in understanding the desire for projects that help promote business in the area, and to help alleviate concerns that community members had regarding traffic and parking. For example, although parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"), a Parking

Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. In addition, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, these community engagement efforts led to stakeholder feedback that also helped inform the location for the proposed Project's Alameda Station and Chinatown/State Park Station. These locations were chosen, in part, to help direct increased foot traffic to nearby businesses and provide safe and convenience pedestrian connections to adjacent uses.

The proposed Project's outreach efforts are intended to support Metro's equity goals, including addressing parking and traffic concerns during game and event days, reducing vehicle miles traveled, and increasing transit access for underserved communities by allowing local residents and employees of businesses in the proposed Project vicinity to ride the proposed Project and transfer to/from the regional Metro transit system using their Metro system access pass at no additional cost, through the Community Access Plan.

Public outreach for the proposed Project was designed with environmental justice principles in mind – ensuring that people have fair and equal access to the planning process regardless of race, culture, national origin, disability status, or income. Public outreach was also designed to ensure compatibility with Metro's equity goals by providing community members the ability to meaningfully engage with information about the proposed Project and ask questions and provide public comments in their native languages. This ensures Metro can intentionally collaborate and listen to community experiences from all community members by removing barriers to communication and accessibility.

As discussed in Appendix A, Public Outreach Report, of the Final EIR, eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar which included toll-free dial in options and ADA accessibility features. To reflect the surrounding community, Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

TOPICAL RESPONSE O
Response to UCLA Mobility Lab Study

Comments on the Draft EIR attached and/or referred to an analysis conducted by the UCLA Mobility Lab and issued in October 2022, which the Mobility Lab's director referenced as "preliminary in nature" (the Mobility Lab Study).[149] This Topical responds to the Mobility Lab Study.

The Mobility Lab Study was issued through what appears to be a press release and does not provide supporting documentation. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:[150,151]

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Responses to Items in Mobility Lab Study

Comment ML-1 **UCLA Mobility Lab**

Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions

October 24, 2022

University of California Los Angeles

Executive Summary

Los Angeles Aerial Rapid Transit (LA ART), a subsidiary of former Dodgers owner Frank McCourt's company McCourt Global, wants to build an aerial gondola to take people from Union Station to Dodger Stadium. Promoters of the gondola claim that it will take 3,000 polluting cars off neighborhood streets and the 110 freeway before and after Dodger games, leading to a net reduction in greenhouse gas emissions.

Transportation researchers from the University of California, Los Angeles (UCLA) examined these claims using a state-of-the-art transportation simulation model and

[149] UCLA Mobility Lab, Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions, October 24, 2022.
[150] UCLA Mobility Lab. 2023. Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection. January 13, 2023. https://mobility-lab.seas.ucla.edu (accessed September 20, 2023).
[151] UCLA Mobility Lab. 2023. Tweet on January 13, 2023. https://twitter.com/ucla_its/status/1613998706851971075?s=46&t=p_Kv02sYuM0ssXk0RDXWeA (accessed September 20, 2023).

found that the gondola could reduce traffic on major roads around Dodger Stadium on the night of a sold-out game, but the impact would likely be very limited. They found that the gondola likely would take only around 608 cars off the road. The gondola is thus unlikely to significantly reduce greenhouse gas emissions and traffic overall.

Response ML-1 This comment provides a general summary of the items discussed in the Mobility Lab Study. Responses to the Mobility Lab Study are provided below. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for an overview of the proposed Project's sponsor, Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation emissions such as the proposed Project.

Comment ML-2 Methodology

The UCLA researchers – led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering – used the "LA Sim" model they created based on activity-based travel demand and agent-based simulation models. The model is grounded in the theory of "discrete choice," for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network.

The researchers caution that this simulation only models the probable use of the gondola for a sold-out night game and further research could reveal different scenarios for a day game or double-header, for example. But the research does model the most likely scenario for fans to choose the gondola – when traffic around the stadium is likely to be most heavy. Around 85% of baseball games played at Dodger Stadium are night games, starting at 7:10pm.

Response ML-2 The Mobility Lab Study states that it used the "LA Sim" model grounded in the theory of "discrete choice" and based on real data about travel systems and behavior in the City. The transportation analysis conducted by Fehr & Peers for the Draft EIR also utilized a transportation model grounded in the theory of "discrete choice," which forms the theoretical basis for nearly all transportation forecasting, and also based on real data about travel networks and travel behavior in the City, including specific details for the proposed Project alignment. As detailed in Section 3.17, Transportation and the Ridership Model Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR, the transportation model utilized for the transportation analysis for the Draft EIR for game day travel was a customized ridership model developed because standard regional travel demand models do not accurately represent special generators such as Dodger Stadium and do not include specialized transit modes such as the proposed Project.

Mobility Lab's "LA Sim" model was derived from the Southern California Association of Government's 2016 regional travel demand model for the Southern California region.[152] A close inspection of Figure 1 of the Mobility Lab's Study shows that the model does not have the detailed roadway network in the vicinity of Dodger Stadium (for example, it does not include Stadium Way, Vin Scully Avenue, Chavez Ravine Place, College Street, Bishops Road, the SR-110 ramps to/from the Dodger Stadium Downtown Gate, and the Dodger Stadium gates themselves). It may also lack the background growth factors contained in the City of Los Angeles model for the land use in the study area, as the City of Los Angeles model has the most up to date forecasts based on updates to the relevant community plans in the study area. In the Draft EIR, non-game day travel was estimated using growth factors calculated from the City of Los Angeles' citywide travel demand model. The City of Los Angeles model is derived from the Southern California Association of Government's regional travel demand model for the Southern California region, but with additional roadway network detail and the latest land use growth forecasts in the study area, making this model more appropriate for local area analyses.

In contrast to the Mobility Lab's review, the Draft EIR analysis uses the customized ridership model that more accurately reflects conditions in the vicinity of Dodger Stadium. The ridership model was developed and validated to Los Angeles conditions as documented in the Ridership Model Development Memorandum, in Appendix N, Transportation Appendices, of the Draft EIR. Data specific to Dodger Stadium was utilized to develop the customized ridership model, which included Dodger Stadium attendance and Dodger Stadium Express ridership for all regular season home games in the 2019 Dodger season, zip codes of Dodger game ticket buyers, and Dodger Stadium parking costs. The customized ridership model estimated and compared driving travel times and costs to transit travel times and costs from each zip code to and from Dodger Stadium. By doing so, the ridership model for the proposed Project is a more accurate model of game and event-related travel to and from Dodger Stadium than a more generalized regional travel demand model such as the "LA Sim" model used in the Mobility Lab Study.

Given that different models were used by the Mobility Lab and in the Draft EIR, it is not surprising that results of the modeling would differ. However, the customization of the ridership modeling conducted for the proposed Project ridership model to local conditions and the use of actual data regarding Dodger Stadium fan travel patterns while developing the proposed Project ridership model (as described in the Ridership Model Development Memorandum, in Appendix N, Transportation Appendices, of the Draft EIR) render the modeling and ridership projections in the Draft EIR more complete and accurate and appropriate for use for the proposed Project.

Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and the Ridership Model

[152] Accessed 5/30/2023 from https://mobility-lab.seas.ucla.edu/research/modeling-and-control-of-dynamic-complex-systems-in-smart-cities.

Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR.[153] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.[154]

While the documentation of Mobility Lab's analysis indicates that it is for a sold-out weekday evening. the Dodgers have drawn the most attendance in major league baseball for many years. In the 2019 season, which serves as the baseline year for many of the data inputs used in the ridership analysis, the Dodgers set an annual paid attendance record of 3,974,309, including 28 sellout games out of an 81 game regular season.[155] Congestion around Dodger Stadium is a regular occurrence for nearly every game, with sell outs or near sell outs reflecting a typical peak condition, not an occasional peak condition. Thus, high ridership levels would be expected throughout the season.

Comment ML-3 **Findings**

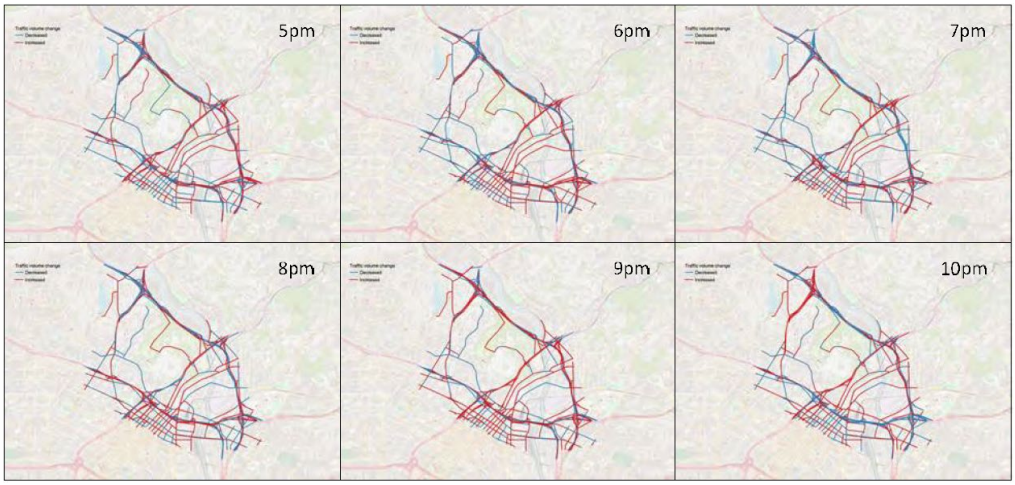


Figure 1: Traffic simulation results by the hour

- **Contrary to claims from LA ART, researchers found that the gondola would not significantly reduce traffic around Dodger Stadium**. Results showed the gondola would likely slightly reduce traffic on some roads around the stadium for a sold-out night game and increase traffic on others, leading to little reduction in greenhouse gas emissions. The red lines in Figure 1 above indicate road segments that have a higher traffic volume after the proposed gondola is added to the traffic simulation. The blue lines indicate a decrease in traffic volume. According to the simulation, the total traffic volume would likely be reduced by around 0.9%

[153] Memo to Holly Rockwell, LA Metro, from Maria Morris and Daryl Zerfass, Stantec, dated March 3, 2023 regarding *Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review*.
[154] Stantec Memorandum to Metro re: LA ART Transportation Analysis Peer Review (March 3, 2023).
[155] Accessed 5/25/23 from: https://dodgerblue.com/dodgers-franchise-record-dodger-stadium-attendance/2019/09/23/.

(less than 1%) on the roads surrounding the stadium if the proposed gondola is built.

Response ML-3 The graphic presented in Figure 1 of the Mobility Lab Study illustrates preliminary traffic simulation results from the Mobility Lab's model for the highway system in the vicinity of Dodger Stadium. The transportation model roadway network shown in Figure 1, however, shows that the Mobility Lab Study and model network is missing many of the critical roadways that link to Dodger Stadium (including Stadium Way, Vin Scully Avenue, Chavez Ravine Place, College Street, Bishops Road, the SR-110 ramps to/from the Dodger Stadium Downtown Gate, and the Dodger Stadium gates themselves). This is typical for regional travel demand models designed for analysis of the regional transportation system, which by design do not include smaller subregional streets or event venues. However, the missing streets play an important role in access to/from the stadium. A more sophisticated localized analysis of traffic increases and decreases in the vicinity of Dodger Stadium should include customization of the model's highway network to include an increased granularity of detail for the streets serving the stadium, as this network has a profound effect on congestion in the neighborhoods surrounding the stadium. The lack of roadway network customization in the Mobility Lab Study model to include the key roadways serving Dodger Stadium underreports the benefits of trip reductions around Dodger Stadium, because the roadways that access the Stadium are those where the full benefit of the proposed Project would be experienced. The omissions of these roadways from the Mobility Lab Study model renders any estimation of traffic reductions and/or increases to be incomplete and aligns with the Mobility Lab's own statement that their forecast for the proposed Project should be considered preliminary.

It should also be noted that the LA Sim model's estimate of traffic volume increases on roadway links are not associated with either the proposed Project or Dodger Stadium, as the Mobility Lab's documentation indicates that riders driving to proposed Project stations were not modeled. Instead, the model is responding to the reduction in cars traveling to and from Dodger Stadium as attendees ride the proposed Project, by shifting vehicles from parallel routes or from other time periods, and communities that use those streets can now travel more easily during pre- and post-game time periods due to reductions in vehicle trips destined to Dodger Stadium as a result of the proposed Project. This would not mean that the proposed Project is ineffective in reducing vehicle miles traveled and greenhouse gas emissions since the community trips are already on the system and do not represent increases in trips, but rather vehicle trips that shift from adjacent corridors or shift in time periods of travel, thereby increasing local access and local vehicle travel opportunities for the community.

Comment ML-4

- **It's unlikely the gondola would contribute to a significant net decrease in greenhouse gas emissions.** Approximately 608 cars would be taken off the road,

not nearly close to the 3,000 LA ART claims. Most of the people who choose the gondola in the simulation – 4,470 – board the gondola at Union Station, with another 220 passengers boarding at a station proposed to be located at Los Angeles State Historic Park near Chinatown. With only 4,690 people taking the gondola in total and of those 2,500 estimated to be regular users of the Dodger Stadium Express clean energy buses there would only be 2,190 new people taking public transportation to the game using the gondola. The average car parking at the stadium carries 3.6 people, which means that the approximate number of cars taken off the road would be around 608. The simulation only models the number of passengers connecting the gondola via public transportation, on foot or by bike. It does not model people who would drive to Union Station or Chinatown to take the gondola. However, people who drive to those stations to take the gondola would not contribute to a net reduction in traffic or greenhouse gas emissions.

Response ML-4 As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 17, Transportation, of the Draft EIR, the Draft EIR estimates that 6,000 game or event attendees would ride the proposed Project to a game or event in Dodger Stadium in 2026. This total includes those who would access the proposed Project via bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the Draft EIR estimates that 4,050 of the 6,000 riders in 2026 would arrive via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N, Transportation Appendices, of the Draft EIR. The Mobility Lab Study states that its simulation only models passengers connecting to the proposed Project via transit, bicycle, or walking, but does not model riders driving to access the proposed Project and estimates that 4,690 riders would ride the gondola in its simulation. This is a key distinction between the Mobility Lab Study and the ridership estimates in the Draft EIR: the Mobility Lab Study estimate of 4,690 proposed Project riders arriving via transit/walk/bike is actually higher than the number of riders in the Draft EIR that are projected to connect to the proposed Project via transit/walk/bike because it excludes park-and-ride and rideshare modes of access. The corresponding number from the Draft EIR is 4,050 of the estimated 6,000 riders in 2026 arriving via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N. Thus, the ridership projections in the Draft EIR are actually more conservative than those in the Mobility Lab Study as to the assumption of riders arriving via transit/walk/bike.

As stated on page 3.17-27, in Section 3.17, Transportation, of the Draft EIR, based on data from the 2019 regular season with an average game attendance of 48,650, the average Dodger Stadium Express ridership was 2,260 per game, with 1,845 per game for the Union Station route and 415 from the South Bay routes. The Mobility Lab Study incorrectly states that there are 2,500 estimated regular users of the Dodger Stadium Express. The overestimation of the Dodger Stadium Express ridership in the Mobility Lab Study underestimates the net benefit of the proposed Project.

The Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Union Station Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons (for example, if individuals have a fear of heights). Independent of the Dodger Stadium Express, the opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of game attendees to ride public transportation. As noted above, the Mobility Lab Study underestimates proposed Project riders and overestimates the existing Dodger Stadium Express ridership, thereby underestimating the proposed Project benefits.

The Mobility Lab Study states that 608 cars would be taken off of the road, apparently based on its estimate of 2,190 new people taking transit to Dodger Stadium divided by an assumed average vehicle occupancy (AVO) of 3.6. The Draft EIR does not analyze "cars taken off the road" as it is not a CEQA transportation-related metric. The Draft EIR instead analyzes vehicle miles traveled (VMT), which is the required CEQA transportation impact metric. The estimate of the equivalent of up to 3,000 cars taken off the road quoted in the comment is not generated or used in the Draft EIR and is apparently an estimated reduction in vehicles parking at Dodger Stadium at year 2042 based on the forecast ridership of 10,000 riders per game (approximately 20 percent of total game attendees). It is not an assertion about overall vehicle reduction once those who are estimated to drive to access a proposed Project is factored in.

Given that the potential for proposed Project riders to drive to access the proposed Project is important, and some riders drive and park to access the Dodger Stadium Express today, it is not clear why the Mobility Lab model does not consider the additional riders who would drive to park in off-street parking lots near the Alameda Station or Chinatown/State Park Station to ride the proposed Project. Automobile mode of access to the proposed Project is in fact modeled in the Draft EIR, and taken into account in the VMT estimates. As detailed in the Draft EIR, the proposed Project is forecast to reduce annual VMT by 2,434,000 in the Project's first operational year in 2026, increasing as ridership increases to an annual VMT reduction of 5,067,000 in 2042, even with automobile mode of access to the proposed Project taken into consideration. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime VMT reduced by the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of 129,629,500 VMT. The proposed Project would reduce GHG emissions by 3,493 metric tons of carbon dioxide equivalent per year (MT CO2e/year) in the buildout year of 2026 and by 6,277 MT CO2e/year in the horizon year of 2042. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime emissions of the proposed Project over its useful life (30 years based on

SCAQMD's guidance for GHG significance thresholds) would be a reduction of 166,653 MT CO2e of GHGs.

Comment ML-5

- **The gondola would carry fewer passengers than LA ART has claimed.** LA ART originally claimed that the gondola could carry up to 5,000 passengers per hour on game days. Researchers found that the gondola is likely to carry fewer than a total of 5,000 passengers to Dodger Stadium – 4,690 according to the simulation – even when the service is provided free with a game ticket for a sold-out night game like the playoffs. In a recent parking study, LA ART revised their claim, estimating that 6,000 would ride the gondola to games by 2026, with 4,350 arriving to the gondola via public transportation. The project's Draft Environmental Impact Report contains the same estimate, which corroborates the UCLA estimate of ridership if the gondola were in operation today.

Response ML-5 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 people per hour per direction (pphpd) based on the system's design capacity. Within two hours prior to the start of a game or event at Dodger Stadium, more than 10,000 people could be transported to the Stadium via the proposed Project. Given the capacity of this system, approximately 20 percent of the fans could take the proposed Project. As discussed in Section 3.17, Transportation, of the Draft EIR, the ridership model estimated that 6,000 passengers would ride the proposed Project in 2026 and 10,000 passengers would ride the proposed Project in 2042. The proposed Project did not revise the ridership; 5,000 refers to the capacity of the proposed Project per hour per direction, summarized as 5,000 pphpd, with 6,000 passengers per game estimated to ride the proposed Project in 2026 in the two hours before each game or event.

As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 17, Transportation, of the Draft EIR, the Draft EIR estimates that 6,000 game or event attendees would ride the proposed Project to a game or event in Dodger Stadium in 2026. This total includes those who would access the proposed Project via bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the Draft EIR estimates that 4,050 of the 6,000 riders in 2026 would arrive via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N, Transportation Appendices, of the Draft EIR.[156] The Mobility Lab Study estimates that 4,690 passengers would ride the proposed Project and states that it only modeled passengers that would access the proposed Project via transit, bike and walk. This number (4,690) is actually higher than the corresponding number estimated in the Draft EIR (4,050); as such, the ridership model used in the Draft EIR is actually more conservative than the Mobility Lab Study. Given the closeness of these findings, the Mobility Lab Study then states the following (emphasis added):

[156] The UCLA Mobility Lab Study says that the proposed Project estimated this number to be 4,350. This is not accurate. As discussed in the text, this number is estimated to be 4,050.

> The project's Draft Environmental Impact Report contains the same estimate, which ***corroborates*** the UCLA estimate of ridership if the gondola were in operation today**.**[157]

In other words, the Mobility Lab Study only modeled proposed Project passengers accessing the proposed Project via transit, acknowledges that these estimates are similar to those in the Draft EIR, and then concludes that the Draft EIR estimates actually corroborate the Mobility Lab Study estimate. Given this, it is unclear why the Mobility Lab Study and the comments claim that the gondola would carry fewer passengers than the Draft EIR estimated for the proposed Project. Quite conversely, it would seem that this finding shows that the Mobility Lab Study actually supports the Draft EIR ridership model. In fact, as stated previously, the Mobility Lab Study estimate of 4,690 passengers arriving via transit is higher than the Draft EIR estimate of 4,050 riders arriving via transit/walk/bike.

Furthermore, the Mobility Lab Study estimate is as if the proposed Project were in operation today, whereas the Draft EIR estimates are for future years with future socioeconomic growth (leading to increased vehicle congestion on the regional roadway network) and further expansion of the regional transit system (leading to expanded transit destinations and reduced transit travel times). These factors would enhance the attractiveness of the proposed Project and are considered in the ridership model in the Draft EIR for both 2026 and 2042. All of which further suggests that the Draft EIR ridership estimates are actually conservative compared to the Mobility Lab Study estimate.

Comment ML-6

- **Fewer people would take the gondola after the game – resulting in more traffic and emissions.** In the simulation, some fans – around 2,500 – seem to switch from the free Dodger Stadium Express buses to the gondola on the way from Union Station to a sold-out game, reducing the use of that service by close to half of the passengers it has carried to playoff games in the past. But about half of those passengers – more than 1,000 – seem to switch back to the Dodger Stadium Express on the way home, perhaps to avoid having to wait for a gondola car. Only 1,380 fans take the gondola on the way home in the simulation. This suggests that fans are unlikely to wait in line for the gondola after the game, instead taking the Dodger Stadium Express or perhaps opting for a ride-share, which would increase traffic and greenhouse gas emissions after the game.

Response ML-6 The Mobility Lab Study states that the Mobility Lab simulation shows that almost half of the proposed Project riders who switch to the proposed Project from the Dodger Stadium Express to travel to a game would switch back to the Dodger Stadium Express after a game. Existing Dodger Stadium Express data suggests that there is a post-game drop-off of only around 8 percent, even though fans do wait to board the Dodger

[157] UCLA Mobility Lab, Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions, October 24, 2022, page 4.

Stadium Express (often for a substantial length of time) after the game and even though the Dodger Stadium Express return trip to Union Station averages 20 minutes or more plus time spent waiting in line. The VMT estimates in the Draft EIR assume that this post-game drop-off shifts to rideshare, based on pre versus post-game TNC trip data for the 2019 season at Dodger Stadium. Since the proposed Project return trip to Union Station will only take seven minutes (as compared to 20 minutes or more for the Dodger Stadium Express), a substantial drop-off is not estimated in the Draft EIR modeling. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for further discussion of post-game ridership.

The comment states that fans opting to take the Dodger Stadium Express or rideshare after a game would increase traffic and greenhouse gas emissions after a game. This statement is inaccurate. Regardless of the extent to which fans may do so, the proposed Project will decrease traffic and greenhouse gas emissions after a game compared to the existing condition.

Comment ML-7

- **Few people would use the gondola as a form of transportation other than to get to or from games.** The simulated use of the gondola during the daytime before the game suggests that very few people would use it as a form of transportation outside of getting to and from games: in the simulation, only 60 people – around one gondola carload – traveled to Dodger Stadium during the day, and only 140 passengers traveled from the stadium to Chinatown or Union Station during the day.

Response ML-7 The comment implies that the modeling conducted in the Mobility Lab Study only considered travel to and from Dodger Stadium during non-game times and the low estimate of 200 persons referenced in the comment implies that the Mobility Lab Study did not consider potential market segments such as tourists. The Draft EIR projected use of the proposed Project by neighborhood transit riders, persons traveling to events at Los Angeles State Historic Park, and tourists. The Draft EIR estimates of local ridership on non-game days (or daytime before a game) also considered future socioeconomic growth, and there is a substantial amount of growth projected in the downtown and Chinatown areas, which would translate to additional local riders (see Table 4 on page 16 of 22 in the Ridership Model Development documentation in Appendix N, Transportation Appendices, of the Draft EIR). As noted on page 3.17-34 in Section 3.17, Transportation, of the Draft EIR, neighborhood transit riders, Los Angeles State Historic Park visitors, and tourists were not considered in the VMT and GHG analyses to allow for a more conservative analysis.

As discussed on pages 3.17-24 to 3.17-26, in Section 3.17, Transportation, of the Draft EIR and in Appendix N, Transportation Appendices, of the Draft EIR, ridership was modeled in the Draft EIR for five different potential rider groups for future (not just existing) background socioeconomic and transportation system conditions: Dodger

Stadium game and event attendees, Dodger Stadium employees, tourists, neighborhood riders, and Los Angeles State Historic Park (LASHP) visitors and event attendees. As discussed on pages 3.17-33 to 3.17-35 and in Table 3.17-4, in Section 3.17, and in Appendix N, depending upon the year and whether or not there is a game or event at Dodger Stadium, there could be as many as 6,000 to 10,000 game attendees, 140 Stadium employees, 1,265 to 3,570 tourists, 575 neighborhood riders, and 1,120 LASHP event attendees on a given day.

Comment ML-8

- **The model produced very similar results at different costs for a gondola trip.** LA ART previously announced that a gondola trip would cost $15. Later, they announced that game ticket holders could ride the gondola for free. They have also said that local rides could be purchased for a standard Metro fare. The researchers modeled two scenarios: 1) $10 for residents and free for game ticket holders, and 2) free to the public, and found very little difference in the results, indicating that residents are more likely sensitive to travel time rather than cost. One key factor is that the service area of the gondola is limited and may not attract residents to choose it for daily travel.

Response ML-8 The Mobility Lab Study states that it modeled two fare scenarios: (1) $10 for residents and free for game ticket holders and (2) free to the public. In other words, the Mobility Lab Study only tested different costs for residents, which are by far the smallest portion of the riders. The Mobility Lab Study apparently did not test different costs for gameday fans. Since the projected amount of neighborhood riders is small, it is not surprising that the Mobility Lab Study found very little difference in the results in the two scenarios it tested.

Also, neither of the fare scenarios the Mobility Lab Study modeled for residents is the fare scenario that is proposed for the proposed Project. Refer to Topical Response C, Project Features, for a discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment ML-9 **About the Researchers**

Dr. He is an Assistant Research Scientist at the UCLA Mobility Lab. He has extensive experience in big data analytics, transportation system analysis, and transportation policy evaluations. In the scope of cyber-physical systems, his research enables

interactions between the physical infrastructure and virtual cyber systems by adopting data-driven techniques to support long-term urban system planning, management, and decision-making.

Dr. Ma is an Associate Professor in the UCLA Samueli School of Engineering and Associate Director of UCLA Institute of Transportation Studies. He has led and managed many research projects funded by U.S. DOT, NSF, state DOTs, and other federal/state/local programs covering areas of smart transportation systems, such as vehicle-highway automation, Intelligent Transportation Systems (UTS), connected vehicles, shared mobility, and large-scale smart system modeling and simulation, and artificial intelligence and advanced computing applications in transportation. He is an Associate Editor of the IEEE Transactions on Intelligent Vehicles and IEEE Open Journal of Intelligent Transportation Systems and Journal of Intelligent Transportation Systems. He is Member of the Transportation Research Board (TRB) Standing Committee on Vehicle-Highway Automation, Member of TRB Standing Committee on Artificial Intelligence and Advanced Computing Applications, Member of American Society of Civil Engineers (ASCE) Connected & Autonomous Vehicles Impacts Committee, Co-Chair of the IEEE ITS Society Technical Committee on Smart Mobility and Transportation 5.0.

Response ML-9 The credentials of Dr. He and Dr. Ma are noted for the record and will be provided to the decision makers for review and consideration. As noted in the credentials in the comment, Dr. He and Dr. Ma are specialists in the areas of smart transportation systems such as cyber-physical systems, connected vehicles, and artificial intelligence applications in transportation. An internet search of their respective publications[158,159] did not find any studies of ridership on transit systems in California.

Conclusion

As discussed above, the Mobility Lab Study was announced by press release in October 2022, but was further clarified to be preliminary by its authors in a posting on the Mobility Lab website. The ridership model, assumptions, and estimates in the Draft EIR were prepared by constructing a detailed model utilizing accepted and tested data from both regional and local (City of Los Angeles) modeling, as well as was peer reviewed by a respected international consulting firm and found to be appropriate and reasonable. Any differences between the findings in the Mobility Lab Study and the Draft EIR are therefore to be expected and are explainable. Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or inappropriate for use.

[158] https://www.brianyueshuaihe.com/publications, accessed May 25 2023.
[159] https://mobility-lab.seas.ucla.edu/publications/, accessed May 25, 2023.

TOPICAL RESPONSE P
Gondola System Noise Modeling

Comments on the Draft EIR raised questions regarding the noise model used to predict noise levels from operations of the proposed Project. As discussed in Section 3.13, Noise, of the Draft EIR, on page 3.13-24, there is no universally recognized standard methodology for predicting noise levels for gondola transportation systems. However, a targeted literature review identified a journal article, *Noise prediction models for gondola ropeway components*,[160] (Rossi Article) which was used to predict noise levels that would result from operations of the proposed Project.

Gondola System Background and Technology

Prior to presenting additional information on the noise model, it is useful to first provide a background on gondola system technology. As detailed in Section 2.4, Description of the Proposed Project, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would employ a Tricable Detachable Gondola system (also known as "3S"). The gondola system technology consists of stations, a non-passenger junction, towers to support the cables, and cabins.

Station and Non-Passenger Junction Cables and Ropeway Operations

The proposed Project's 3S system would be comprised of two stationary cables (track ropes) that provide support for the running wheels of the cabins, and a third cable (haul rope) that would circulate continuously around the system. The haul rope is looped around two large sheaves (wheels with a groove for the rope). One of the large sheaves is the "drive bullwheel," which would be located at one station/junction, and the other large sheave is the "return bullwheel," which would be located at the opposing station/junction. The haul rope, which is the propulsion rope, is moved by the turning of the drive bullwheel. The drive bullwheel is turned by motors located at the station or junction. The return bullwheel acts like an idler wheel providing haul rope location control, but no motive power. The haul rope moves at a steady pace around the bullwheels pulling the cabins along the ropeway and in and out of each station or junction.

One haul rope loop would be for the ropeway system between Alameda Station and Broadway Junction, and one haul rope loop would be for the ropeway system between Broadway Junction and Dodger Stadium Station. For the section from Alameda Station to Broadway Junction, the drive bullwheels and associated motors and drive equipment are anticipated to be at the Broadway Junction and the return bullwheels would be located at Alameda Station. At Chinatown/State Park Station within this section, sheaves would control the haul rope. For the section from Broadway Junction to Dodger Stadium Station, the drive bullwheels and associated motors and drive equipment are anticipated to be at Dodger Stadium Station, and the return bullwheels would be located at Broadway Junction. Accordingly, the Broadway Junction would include both a drive bullwheel and a return bullwheel.

[160] Rossi, F. and Nicolini, A. Noise Prediction Models for Gondola Ropeway Components. Noise Control Engineering Journal, 59 (5), pp. 415-431, September-October 2011.

Towers

The towers for the proposed Project would be designed to support the steel cables required for the 3S system. At towers, mechanical equipment would provide rope control and maintenance functions. The track ropes are supported by the profile beams. Between the profile beams, the haul rope rides on a series of wheels, or sheaves, which maintain the rope position.

Cabins

3S Gondola system cabins carry between 30 to 40 passengers depending on the exact configuration of seating and cabin amenities selected. The cabins for the proposed Project would move at a maximum speed of 13.4 miles per hour (6 meters per second).

The Rossi Article Methodology

As discussed in the Rossi Article, noise from gondola system operations "may be not well represented by traditional noise prediction models."[161] Accordingly, the authors of the Rossi Article developed a noise prediction model to provide a more accurate evaluation of the noise produced by the new generation of gondola ropeways. To develop the noise prediction model, the authors conducted "a measurement campaign . . . at different short distances from gondola towers and stations."[162] The authors investigated two kinds of gondola stations: 1) stations with tensioning systems and 2) stations with underground motor units. The authors investigated three kinds of gondola towers: 1) with support sheaves, 2) with hold-down sheaves, and 3) with double acting sheaves. Based on these noise measurements from several modern aerial gondola systems, the authors established noise propagation models for station noise and tower noise. "[N]oise measurements were conducted on new generation 8-seater gondola ropeways with line speed values of 3.5 m/s and 5 m/s."[163] However, the Rossi Article found that the station equations were also suitable for different kinds of gondola ropeways (e.g., with additional seats) and for different line speeds.

The Rossi Article then validates its noise propagation model with "further measurements conducted in random chosen points of gondola ropeway case studies, which correspond to the typical position of critical receptors."[164] The Rossi Article also explains that the noise propagation model was developed "based on an impacted area with no obstacles between the noise source and the receptors."[165] Specifically, "the investigated towers and stations are placed in a territory not characterized by natural or artificial noise barriers."[166] In addition, the most frequent and worst case in terms of carrier load was analyzed for tower noise, and the worst case in terms of noise emissions was analyzed for station noise.[167]

As provided in the Rossi Article in Table 6, the sound power levels for stations with underground motor units are louder than the tensioning system. The sound power level reflects the innate acoustical energy

[161] Rossi, F. and Nicolini, A. 2011. Noise Prediction Models for Gondola Ropeway Components. Noise Control Engineering Journal, p. 415. Available at: https://www.researchgate.net/publication/257941072_Noise_prediction_models_for_gondola_ropeway_components. Accessed August 2023.
[162] Id., pp. 415-416.
[163] Id., p. 417.
[164] Id., p. 416.
[165] Ibid.
[166] Id., p. 417.
[167] Ibid.

generated by the operations of the station and, as a result, the sound power values do not consider factors that would affect the actual received sound pressure level at a receiver such as the source type, source dimensions, or the physical environment between the source and receiving point (e.g., distance, reflective ground, air absorption). Accordingly, the sound power levels of the underground motor unit do not reflect that the source is underground and instead reflect that the station is "powered" by a motor. Accordingly, as provided on page 3.13-26 of the Draft EIR, to provide a conservative analysis, the noise analysis for the proposed Project utilized the equations for the underground motor systems ("powered") because of the higher sound power levels that are generated by those equations.

For towers, the Rossi Article found that hold-down sheaves are louder than support sheaves or double-acting sheaves. Accordingly, as provided on page 3.13-26 of the Draft EIR, to provide a conservative analysis, the noise analysis for the proposed Project utilized the equations for the hold-down sheaves.

As noted above, the Rossi Article equations were established based on 8-seater gondola ropeways. While the Rossi Article found that its equations were suitable for different kinds of gondola ropeways and line speeds, the noise analysis for the proposed Project took the additional step of validating the Rossi Article equations against a 3S gondola system similar to the system that would be used for the proposed Project to ensure that the Rossi Article equations could be appropriately used to predict noise levels from operations of the proposed Project. The validation process is discussed further below.

The Evaluation of Operational Noise Impacts in the Draft EIR Appropriately Relied on the Rossi Article

Based on the design of the proposed Project described above, and as discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, a 3S gondola system similar to the proposed Project was utilized in the assessment of noise impacts to validate the Rossi Article equations to ensure that the Rossi Article equations could be appropriately used to predict noise levels from operations of the proposed Project.

As provided in the Noise Measurement Detail, included in Appendix M of the Draft EIR, Leitner Poma provided operational noise measurements for a 3S gondola system. As provided in Appendix L, 3S Sound Measurements Memo, of this Final EIR, Leitner Poma updated its memorandum to provide additional detail on this 3S gondola system, which further confirms the similarities between the proposed Project and the Leitner Poma 3S gondola system.

As provided therein, the reference noise levels in Leitner Poma's Noise Measurement Detail were taken in Tyrol, Austria at the Stubai Glacier. The system is known as the Eisgratbahn gondola. Though in Section 2.0, Project Description, of the Draft EIR, the Koblenz 3S system in Germany is listed as one of many precedent examples of aerial rapid transit systems and is an example of an urban gondola system, the Draft EIR's assessment of noise impacts does not utilize noise data from the Koblenz 3S system. Because the Koblenz 3S system is located in an urban area, it would be harder to isolate noise levels generated from the 3S system from other urban noise sources, such as, traffic. Accordingly, taking measurements in an urban area for validation purposes is less desirable. In contrast, because the Tyrol system is not located in an urban environment and is instead located in the Alps, the measured noise source from the system was not influenced by other noise sources and nearby buildings reflecting surface. Therefore, it is easier to isolate the noise from the 3S system in Tyrol.

As provided in Appendix M, 3S Sound Measurements Memo, of this Final EIR, the Leitner Poma system in Tyrol has a number of similarities to the proposed Project. Like the proposed Project, the Tyrol system is a 3S system and measurements used for validating the Rossi Article are those using the same speed of the proposed Project at 6 meters/second. In addition, the Tyrol system has a cabin capacity of 32, which is consistent with the proposed Project's cabin capacity of 30 – 40. Finally, the system mechanics would be similar, because like the proposed Project, the Tyrol system includes an above-ground drive motor and bullwheel as well as a return bullwheel at the station where noise measurements were taken. Based on the similarities between the 3S gondola system for the proposed Project and the 3S gondola system in Tyrol, using the Tyrol system to validate the Rossi Article equations is appropriate and no adjustment to the noise predictions is needed to use the Tyrol system to validate the Rossi Article.

Certain comments on the Draft EIR express concern that the Broadway Junction would include both a drive bullwheel and a return bullwheel and therefore the noise assumptions for the junction should not be the same as the assumptions for the stations. Like the Broadway Junction the system in Tyrol includes both a drive bullwheel and a return bullwheel. Accordingly, the assumptions in the Draft EIR conservatively reflect noise associated with both a drive bullwheel and a return bullwheel at all station and junction locations. Therefore, a separate assumption for the Broadway Junction analysis is not needed.

Tables 5-3 and 5-4 of Appendix M, Noise and Vibration Technical Report, of the Draft EIR, summarize the results of the validation calculations and show the predicted noise levels using the Rossi Article equations that were selected for the proposed Project and the measured noise taken from the system in Tyrol. As shown therein, and as discussed on pages 37 through 39 of Appendix M, Noise and Vibration Technical Report, of the Draft EIR, use of the Rossi Article's equations to evaluate the proposed Project's operational noise is validated by the measured noise from the Tyrol system and results in a conservative assessment of the noise generated by the proposed Project. Specifically, as shown in Table 5-3, this comparison led to a conservative average over-prediction of 2.6 dBA across all station locations. In addition, as shown in Table 5-4 the predicted noise levels for the tower on average were within 0.2 dBA of the measured noise levels. The differences in the station and tower noise levels are within the standard engineering tolerance. Specifically, per Caltrans, model accuracy is usually sufficient when the difference between measured and model sound level is less than 3 dBA because of the inherent uncertainties in the measurements and calibration procedure.[168] Accordingly, use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated using a 3S gondola system that is similar to the proposed Project and use of the model has been shown to result in a conservative assessment of the noise generated by the proposed Project.

[168] Caltrans, Technical Noise Supplement, Section 4.4.1.6 Tolerances (September 2014).

6.3 RESPONSES TO COMMENTS

Section 6.3, Responses to Comments, includes responses to all comments received on the Draft EIR during the Draft EIR public review period. The comments and responses are organized as follows: state agencies ("S"), local agencies ("L"), groups and organizations ("GO"), individuals ("P"), and verbal and written comments received during the four Draft EIR public hearings ("PH"). Responses to comments are organized as follows:

- Section 6.3.1 Responses to Public Agencies: Contains responses to all state agencies ("S") and local agencies ("L") comments.
- Section 6.3.2 Responses to Groups and Organizations : Contains responses to all groups and organizations ("GO") comments.
- Section 6.3.3 Responses to Public/Individual Comment Letters: Contains responses to all written individuals ("P") comments.
- Section 6.3.4 Responses to Public Hearings: Contains responses to all verbal and written comments received during the four Draft EIR public hearings ("PH").

Section 6.3.1
Responses to
Public Agencies (State and Local)
Comment Letters

Comment Letter S1 – CA Department of Fish and Wildlife

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S1

Comment S1-1 Dear Mr. Zelmer:

The California Department of Fish and Wildlife (CDFW) has reviewed the Los Angeles Aerial Rapid Transit Project (Project) Draft Environmental Impact Report (DEIR) from the Los Angeles County Metropolitan Transportation Authority (Metro). Supporting documentation for the Project includes a Biological Resource Assessment (BRA) dated October 2022. CDFW appreciates the opportunity to provide comments and recommendations regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

Response S1-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses S1-2 through S1-15.

Comment S1-2 CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Response S1-2 Metro appreciates the California Department of Fish and Wildlife (CDFW) for preparing comments on the Draft EIR. This comment provides a general summary of the role and authority of the CDFW under CEQA. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, "The [Biological Study Area ("BSA")] does not include water features falling under CDFW jurisdiction." Responses to the comments contained in this letter are provided in Responses S1-4 through S1-15.

Comment S1-3 Project Description and Summary

Objective: The Project would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. The proposed 1.2-mile route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed aerial gondola system would include aerial cables, passenger stations, a non-passenger junction, towers to support the aerial cables between the stations/junction, and gondola cabins for the passengers.

Location: The proposed Project would be located in the County of Los Angeles, within or adjacent to the communities of El Pueblo, Union Station, Chinatown, Mission Junction, Solano Canyon, and Elysian Park.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist Metro in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Response S1-3 This comment includes a summary of the proposed Project and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. Responses to the comments contained in this letter are provided below in Responses S1-4 through S1-15.

Comment S1-4 Comment #1: Operational Impacts to Birds

Issue: Project operation may impact resident and migratory bird species that move through the alignment area.

Specific impacts: The BRA states, "Potential direct impacts could include bird collisions with the proposed stations, junction, towers, cabins, and ropeway cables, or electrocution if they come in contact with an energized component of the system." The BRA also states, "Significant impacts can occur when towers or wires are constructed in migratory corridors and obstruct the flight paths of migrant birds. This is particularly true for structures equipped with constant (rather than flashing)

lighting or reflective surfaces like glass, which tend to attract nocturnal migrants during flight and increase the probability of collision."

Why impacts would occur: The BRA defends that Project operation will not be significant because, "The proposed Project alignment is located on a broad urbanized coastal plain, midway between the coast and the mountains, and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat. Given the lack of habitat and topographic features that would promote concentrated avian migratory activity, impacts to migrants, including nocturnal species, are not expected to be significant."

Response S1-4 This comment provides quotes from Appendix E, Biological Resources Assessment, of the Draft EIR. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project are likely to reduce the risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C in response to Recommended Potentially Feasible Mitigation Measure #2, outlined in Comment S1-6, below. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B in response to Recommended Potentially Feasible Mitigation Measure #1, outlined in Comment S1-6, below. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines. Refer to Response S1-5 and S1-6 for additional discussion of how the proposed Project would not pose a collision risk to wildlife.

Comment S1-5 While the Project alignment may not be a large stopover habitat for migrant birds, there are numerous accounts, according to eBird, of many birds that utilize the

alignment area as habitat. In particular, the Los Angeles State Historic Park has a wide variety of bird species that have been accounted for, including a number of special status species such as the loggerhead shrike (Lanius ludovicianus) and Peregrine falcon (Falco peregrinus) (eBird 2022 {https://ebird.org/hotspot/L2581057}). Loggerhead shrike are designated California Species of Special Concern (https://wildlife.ca.gov/Conservation/SSC) and Peregrine falcon is a species classified as fully protected (https://wildlife.ca.gov/Conservation/Fully-Protected) under CDFW. Even if avian activity is not "concentrated" in this area, the DEIR does not acknowledge the numerous avian species that use the alignment area and its vicinity as habitat. Moreover, there are several locations in the surrounding alignment vicinity with a wide variety of avian species accounts, including Elysian Park, Los Angeles River, Grand Park, Echo Park, and the Silver Lake Reservoir.

Response S1-5 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of the presence of avian habitat and the potential avian use of the proposed Project area. The Draft EIR addressed impacts to biological resources, including special status bird species, in Section 3.04, Biological Resources, with supporting data provided in Appendix E of the Draft EIR. As stated on pages 3.4-12 and 3.4-13 of Section 3.04, Biological Resources, of the Draft EIR, 39 special-status wildlife species were identified by the CNDDB database to have historically been recorded from the Los Angeles and surrounding eight quadrangles. Nine of those species were historically recorded within the biological study area (BSA) for the proposed Project. However, of the nine species with observations from within the BSA, the most recent are for bat species from 25 to 30 years ago. All other observations are 50 years old or older. Based on this publicly available data, the Draft EIR found that impacts to special status species would be less than significant with incorporation of Mitigation Measures BIO-A and BIO-B to reduce potential impacts to bats and nesting birds especially since the habitat in the area has been drastically modified so as not to be useful to special status species since the species were recorded.

As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the BSA encompasses a 500-foot buffer around the proposed Project alignment. Habitats and wildlife occurring outside of this 500-foot buffer were considered to be a sufficient distance away to not be affected by construction or operation of the proposed Project. All wildlife detected during the two initial surveys (April 1, 2020, and April 24, 2021) were noted in the Draft EIR. The surveys monitored for all wildlife, including any sensitive species. As discussed in Appendix G, out of an abundance of caution, a third field survey was performed March 23, 2023, to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. During this visit, two biologists surveyed the BSA over a 4.5-hour period (11:00 AM to 3:30 PM) and observed 17 bird species and 2 mammal species. As determined by the biologists that conducted the additional survey, there would be no new significant

impacts nor a substantial increase in the severity of an environmental impact identified in the Draft EIR. In addition to the field surveys, as part of the preparation of the Draft EIR, an assessment of habitat suitability and a California Natural Diversity Database (CNDDB) records search were conducted to identify records of sensitive species in the USGS Los Angeles Quadrangle, within which the BSA is located, and the surrounding eight quadrangles; an area measuring approximately 21.5 miles by 26 miles. As noted in the Draft EIR, the most recent CNDDB record of special-status species in the BSA was from 25 years ago, with no records of federal or state-listed wildlife species in the BSA in the past 100 years.

Comment S1-6 In addition, page 48 of the BRA provides reasoning why collisions with cables will not be significant since the diameter and grouping of the cables would make them more visible. However, there is no evidence to support the claim that the diameter and grouping of the cables would prevent bird collisions to a level that is less than significant. More importantly, take is not permitted for fully protected species, so collisions must be completely prevented for these species. Additionally, there is still potential for lighting and reflective surfaces on the gondolas, stations, and towers that may attract birds and cause collisions, especially if birds are flying during low light hours. Artificial light may attract or disorient migrating birds by disrupting navigation. Resident birds and migrants are also known to collide with windows year-round, not only during migration (Ogden 1996).

Impacts to any sensitive, special status species, and/or migratory bird species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The DEIR does not provide any avoidance, minimization, or mitigation measures to prevent impacts to special status species. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Evidence impacts would be significant: CEQA provides protection not only for ESA and CESA-listed species, but for any species including but not limited to SSC, which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). In addition, fully protected status precludes CDFW from authorizing any amount of incidental take or intentional take (including collisions and/or electrocutions associated with operational impacts) to meet any project mitigation requirement (Fish & G Code, § 3511). When projects show the potential to cause take of fully protected species, CDFW advises on appropriate measures to avoid take. Given the legal status of fully protected animals, take avoidance measures should meet very high standards of effectiveness, substantially greater than the measures to minimize take required under Incidental Take Permits. Lastly, migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA)

of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor. The Project's operational impacts have yet to be mitigated below a significant level. Accordingly, the Project continues to have a substantial adverse effect, either directly or through habitat modifications, on avian species identified as a candidate, sensitive, or special-status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends the DEIR include measures to mitigate for collision impacts with the cables, gondola cars, stations, and towers. CDFW recommends Metro develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address any bird collisions that may occur. This Plan should prescribe the following:

1. Measures to allow birds to see structures during low light hours. Artificial lighting should be eliminated where unnecessary as to prevent attracting birds or shielded down where possible. The DEIR should investigate different types of lights and lighting regimes with reference to their effect on the safety of migrating birds;
2. Measurable goals and success criteria that eliminates or reduces collisions to the maximum extent feasible. Measurable success criteria should be based on site/habitat conditions prior to Project operations. Collisions should be eliminated for fully protected species as no take can occur for these species;
3. Contingency measures if the success criteria is not met;
4. Long-term monitoring for at least 10 years;
5. Adaptive management techniques.; and
6. Annual reporting criteria and requirements.

Mitigation Measure #2: Any windows in stations, towers, or gondolas should be made visible to birds in flight. This may be achieved by using non-reflective tint or window film. Reflective surfaces should be reduced as much as possible with opaque or translucent surfaces.

Response S1-6 Refer to Response S1-5 for a discussion of surveys conducted in connection to the proposed Project, which did not indicate the presence of special-status species, and how the most recent CNDDB record of special-status species in the BSA was from 25 years ago, with no records of federal or state-listed wildlife species in the BSA in the past 100 years. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than

significant. This analysis also discusses how development in the entire Los Angeles Basin provides a major source of light pollution, and there is no evidence that light in the vicinity of the proposed Project would draw migrants to the area, any more than similar lighting in other areas over the Los Angeles Basin would be expected to. In addition, lighting for the proposed Project would be low-level and primarily integrated within the architectural features. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable lighting standards.

Refer to Response S1-4 for a discussion of how the proposed Project includes design features that reduce the risk of avian collisions. In addition, the proposed Project's stations and junction are designed to be open-air buildings, and accordingly do not include any windows. The proposed Project's three towers are designed as monopoles comprised of faceted structural steel panels that comprise the tower's swooping form in a neutral light-tone gray intended to conform to the surrounding urban environment and would not provide a highly metallic or mirrored finish. Accordingly, no windows are proposed for the proposed Project's towers. Because there are no windows at the proposed Project's stations, junction, and towers, Recommended Potentially Feasible Mitigation Measure #2 is inapplicable with respect to those components. As discussed above, windows on the cabins should not pose any risk to diurnal birds because they will be tinted and partially covered with a vinyl window film.

While the proposed Project would not have potentially significant impacts to sensitive, special status species, and/or migratory bird species, in response to Recommended Potentially Feasible Mitigation Measures #1 and #2 in this comment, the proposed Project would incorporate additional Project Design Features (PDFs) (BIO-PDF-B and BIO-PDF-C) to further reduce the already less than significant effects. In response to this comment requesting the proposed Project implement additional measures to protect sensitive, special status species, and/or migratory bird species, the proposed Project will implement BIO-PDF-B, requiring the development of an Avian Collision, Migration, Monitoring, and Adaptive Management Plan to address the potential for bird collisions, including the development of an adaptive management table, and BIO-PDF-C, requiring cabin windows to be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of various Project Design Features adopted in order to provide additional environmental benefits with respect to the potential for bird collisions.

Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. In addition, the proposed

Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet above ground level (agl), whereas the proposed Project component heights are all below 200 feet agl. Section 3.04, Biological Resources, of the Draft EIR—as further supported in Appendix G, Supplemental Biological Resources Report, of the Final EIR—states that migrant birds would pass over the alignment, and there is potential for birds to interact with ropeway cables when flying below 175 feet agl and towers when flying below 200 feet agl. However, there is little evidence to suggest that the presence of natural features, such as the Los Angeles River or Silver Lake Reservoir, would result in concentrated migration, specifically in the proposed Project area. The Los Angeles River, which is approximately 0.5 mile east of the BSA is heavily impacted and is predominantly a concrete water-conveyance structure. The river corridor does not contain appreciable vegetation until it reaches more than 1 mile north of the proposed Project BSA. The Silver Lake Reservoir is more than 2 miles to the northwest. Waterbirds and other migrants may pass over the proposed Project en route to and from these locations, but there is no reason to believe the movement would be concentrated in the vicinity of the proposed Project (and below 200 feet agl) versus along alternate routes. Furthermore, direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment.

Comment S1-7 Comment #2: Impacts on Burrowing Owls

Issue: The Project may have a significant impact on burrowing owl (Athene cunicularia), a designated Species of Special Concern (SSC).

Specific impacts: Burrowing owls have been recorded at the Los Angeles State Historic Park. Project construction and activities may result in injury or mortality of burrowing owls and disrupt natural burrowing owl breeding behavior.

Why impacts would occur: Nest and roost burrows of the burrowing owl are commonly dug by ground squirrels (Citellus beecheyi). According to iNaturalist (https://www.inaturalist.org/observations?nelat=34.07240934999999&nelng=-118.22377465&place_id=any&subview=map&swlat=34.06254515000001&swlng=-118.23908605&taxon_id=180007) (2023), there have been accounts of California ground squirrel within Los Angeles State Historic Park, which can provide potential cover sites for burrowing owls. There were no surveys for burrowing owl conducted for the BRA despite the Project alignment transecting through the Los Angeles State Historic Park. The DEIR, therefore, does not provide compensatory mitigation for potential impacts to habitat for burrowing owl. In California, threat factors affecting burrowing owl populations include habitat loss, degradation, and modification. Project activities could result in potential habitat loss or disturbance for burrowing owl .which would subsequently result in local extirpation of the species and contribute to local, regional, and State-wide declines of the species.

According to the DEIR, construction will take approximately 25 months. The Project may therefore temporarily impact habitat supporting burrowing owls for this length of time. However, the DEIR does not disclose how long these temporary impacts may last. Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The DEIR does not provide mitigation for potential loss of habitat supporting burrowing owls. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Evidence impacts would be significant: The burrowing owl is a designated SSC. An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2023a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #3: CDFW recommends burrowing owl protocol surveys be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. Surveys for burrowing owls should adhere to survey methods described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843) prior to issuing construction permits (CDFW 2012). In California, the burrowing owl breeding season

extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct 4 survey visits: 1) at least one site visit between February 15 to April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after 15 June.

If burrowing owls are identified utilizing the Project site during the surveys, Metro should prepare an Impact Assessment in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Then, Metro should develop a Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Metro should contact CDFW to develop appropriate mitigation/management procedures.

Mitigation Measure #4: CDFW recommends that Metro disclose the length of time for temporary impacts to burrowing owl habitat. Based on those temporary impacts, CDFW recommends Metro mitigate for temporary and direct impacts to burrowing owl. There should be no net loss of burrowing owl habitat. Metro should set aside replacement habitat offsite for acreage of impact and number of burrows. Replacement habitat should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands. Mitigation Measure #5: CDFW recommends that Metro avoid using any rodenticides and second-generation anticoagulant rodenticides during Project activities.

Response S1-7 As described in Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, burrowing owls commonly use ground squirrel burrows for nesting and roosting, and the presence of such burrows suggests that there may be potential for burrowing owl habitat. No California ground squirrels, burrowing owls, or suitable habitat for burrowing owls were detected during initial surveys. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, Section 5.1.2, for additional discussion of burrowing owls and burrowing owl habitat in the proposed Project area. As discussed in Appendix G, a subsequent survey of the BSA was performed on March 23, 2023, during which potentially suitable burrowing owl habitat (open, flat terrain with short vegetation) and immediately adjacent areas were surveyed for the presence of California ground squirrels or their burrows. No California ground squirrels, or burrows were visually detected in the surveyed areas. California ground squirrel vocalizations were heard on the slope between the proposed Stadium Tower and Dodger Stadium Station locations. Although this area could not be surveyed on foot, it was deemed not suitable for burrowing owls due to the presence of trees, tall ground cover vegetation, and a steep slope.

Because there is no suitable habitat for burrowing owls in the BSA, and no known occurrences of burrowing owls are documented in the BSA, the proposed Project would result in a less than significant impact related to burrowing owls. CEQA does

not require the implementation of mitigation measures where impacts would be less than significant. Nevertheless, refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of how the proposed Project will incorporate BIO-PDF-D in response to recommended measure MM-BIO-5 provided in this comment, requiring that the proposed Project avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities.

Comment S1-8 Comment #3: Tree Removal

Issue: The Project proposes to remove 250 trees along the Project alignment.

Specific impact: The DEIR lists that one protected tree (Mexican elderberry) would require a replacement ratio of 4:1; 82 trees that are non-protected but are significant would require a replacement of 1:1; 34 street trees would be removed and would be replaced "at a ratio agreed upon during consultation with the Urban Forestry Division"; and 75 trees located on State Park Property would be replaced "on California Department of Parks and Recreation State property and private property at a 1:1 ratio". Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the trees as habitat.

In addition, Project activities that involve removal of trees or parts of trees have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors.

Why impacts would occur: The total replacement ratio of all 250 trees to be removed along the Project alignment is currently unknown. CDFW is therefore unable to determine if these replacement ratios are sufficient in mitigating for impacts to trees removed. The lack of complete mitigation ratios for tree removal in the DEIR may result in an ultimate total net loss of trees associated with the Project activities.

Moreover, all trees on site may provide habitat for wildlife within the Project vicinity. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area. The loss of trees should be included in the mitigation efforts.

Lastly, there is no proposed investigation and plan for managing tree pests or pathogens at the time of removal. This may result in the introduction of pests, pathogens, or diseases to areas where they previously have not been found.

Evidence impacts would be significant: The greater Los Angeles area is home to a wide variety of migratory and non-migratory species of birds that utilize the urban ecosystem. Studies have shown that street trees provide necessary foraging habitat to birds and are a critical resource to promote avian biodiversity. Feeding bird density has been shown to be positively associated with increases in density and size of street trees. In addition, there is evidence that avian species generally prefer native street-tree species and only a few nonnative tree species for foraging (Wood & Esaian 2020). CDFW is concerned that without sufficient mitigation for the loss of trees, there will

be a negative impact of wildlife species, such as birds, in the alignment area that would use these trees for potential nesting and foraging habitat.

Lastly, without a proper investigation and management plan, the Project may also result in an adverse effect, either directly or through habitat modifications, by exposing other habitats to insect and/or disease pathogens. Exposure to insect and/or disease pathogens may have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #6: An infectious tree disease management plan should be developed and implemented prior to initiating Project activities. All trees scheduled for removal should be inspected prior to start of those activities for contagious tree diseases including but not limited to: thousand canker fungus (http://www.thousandcankers.com/) (Geosmithia morbida), Polyphagous Shot Hole Borer (https://ucanr.edu/sites/eskalenlab/?file=/avocado.html) (Euwallacea spp.), and goldspotted oak borer (http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html) (Agrilus auroguttatus) (TCD 2022; UCANR 2022; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees, or any parts thereof, should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

Mitigation Measure #7: Given that the DEIR does not provide justification for how the mitigation ratios presented would adequately reduce Project impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors, CDFW recommends replacing native trees with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees. CDFW concurs with the replacement ratio for the Mexican elderberry.

Recommendation #1 Phased Tree Removal: CDFW recommends Metro consider phased removal of trees (i.e., phased Project approach) in order to minimize impacts resulting from the temporal loss of trees and to provide structurally diverse tree replacement habitat while mitigation for impacts to tree removal occurs. CDFW recommends providing nesting perch structures in the interim of replacement trees being installed so as no nesting habitat is lost during construction. Perches should be installed at an appropriate distance from the work area to reduce impacts to nesting birds.

Response S1-8 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR. The proposed Project would implement BIO-PDF-F, and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to

Table 4-1 of Appendix G, for discussion of applicable tree replacement requirements in the City of Los Angeles. As shown in this table, protected trees require a replacement ratio of 4:1, while significant trees require a mitigation ratio of 1:1. Removed "street trees" that occur in the public right-of-way (ROW) are to be replaced at a ratio specified by the Urban Forestry Division; typically, at a 2:1 ratio. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, it is anticipated that mitigation ratios for trees on land administered or managed by responsible agencies would be agreed to as part of the approvals required for implementation of the proposed Project. The proposed Project would provide a minimum replacement ratio of 1:1 for all trees removed in the Los Angeles State Historic Park and a replacement ratio of 1:1 for significant trees removed in the State Route (SR) 110 California Department of Transportation (Caltrans) ROW.

As discussed in Appendix G, of the Final EIR, removal of certain of the trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. The magnitude of impacts to wildlife from tree removal depends on several factors, including the amount of habitat to be removed and the quality of that habitat. In the long-term, the impacts are also affected by the replacement plan for the removed trees. The quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. Of the 26 tree species identified in the tree inventory report, 20 are considered non-native (and five of those are considered invasive). Furthermore, 122 of the 145 large trees (>8 inches DBH), and 71 of the 105 smaller trees, are non-native species. All of the 57 native trees were planted as ROW trees (12 trees) or were planted as part of a plant program in the Los Angeles State Historic Park, and 34 of these 57 trees are young, with a DBH of <8 inches. Other areas are composed of 100-percent non-native trees, often covered in non-native and invasive vines such as Kudzu (*Pueraria montana*).

The only areas of tree removal that could be potentially described as wooded habitat are the following: the small grove of Fremont cottonwood trees at the western end of the Los Angeles State Historic Park, the non-native woodland at the Stadium Tower and associated fire buffer, and the non-native woodland at the Dodger Stadium Station location. The total area of wooded habitat that would be removed in each of these areas is 0.24, 1.02, and 0.39 acres, respectively. These areas are relatively small amounts of wooded habitat, relative to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park.

In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent

habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, the replacement of the 145 large trees proposed for removal with 242 new trees would more than offset any realized impacts associated with the proposed Project.

While the proposed Project would not have significant impacts to sensitive, special status species, and/or migratory bird species through habitat modifications, in response to Recommended Potentially Feasible Mitigation Measures #6 and #7 and Recommendation #1, the proposed Project would incorporate additional Project Design Features (PDFs) to further reduce the already less than significant effects and to provide additional environmental benefits. In response to Recommended Potentially Feasible Mitigation Measures #6 and #7 and Recommendation #1 provided in the comment, an addition to the Draft EIR has been provided to include BIO-PDF-E, requiring the inspection for the presence of contagious tree diseases on trees scheduled for removal and tree disease management if detected, BIO-PDF-F, requiring the proposed Project to comply with applicable tree replacement ratios, and BIO-PDF-G, requiring tree removal for the proposed Project to occur outside of the bird nesting season and bat maternity roosting season. These additions have been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Comment S1-9 Additional Recommendations

Recommendation #2 Nesting Birds: CDFW concurs with the nesting bird mitigation measure BIO-B as proposed in the DEIR. However, it should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW should be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Response S1-9 Refer to Mitigation Measure BIO-B, provided in Section 3.4.6, Mitigation Measures, of Section 3.04, Biological Resources, of the Draft EIR, for measures that would be implemented to avoid impacts to nesting birds, including nesting buffers and other monitoring requirements. Refer to Response S1-8 for a discussion of habitat and tree removal and replacement.

Comment S1-10 Recommendation #3 Construction Fencing: CDFW recommends that any fencing used during and after the Project be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence should be avoided or

minimized as this type of fencing can injure wildlife or create barriers to wildlife dispersal. All hollow posts and pipes should be capped to prevent wildlife entrapment and mortality. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Fences should be installed in a manner that excludes any wildlife from entering the work zone (i.e., embedded fence such that wildlife cannot enter from under the fence). Fences should not have any slack that may cause wildlife entanglement.

Response S1-10 In response to Recommendation #3, the proposed Project would incorporate BIO-PDF-H, outlining requirements for construction materials and practices to avoid attracting wildlife to the proposed Project's construction site, to further reduce the already less than significant effects and to provide additional environmental benefits.

Comment S1-11 Recommendation #4 Data: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Field Survey Forms (https://wildlife.ca.gov/Data/CNDDB/Submitting-Data) (CDFW 2023b). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The County should provide CDFW with confirmation of data submittal.

Response S1-11 Consistent with Recommendation #4, and in accordance with Pub. Resources Code, §21003, subd. (e), the proposed Project's qualified biologist will report all special status species (including Federal or California Threatened or Endangered species, and California Species of Special Concern) documented within the BSA during the development of the proposed Project EIR to the California Natural Diversity Database (CNDDB) by completing and submitting CNDDB Field Survey Forms (CDFW 2023b). The qualified biologist will ensure the data has been properly submitted, with all data fields applicable filled out. The data entry will also list pending development as a threat. The qualified biologist will update the occurrence records after impacts have occurred. The qualified biologist will provide CDFW with confirmation of data submittal prior to finalization of the proposed Project EIR.

Comment S1-12 Recommendation #5 MMRP: CDFW recommends the County update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist the County in developing mitigation measures that are

specific, detailed (i.e., responsible party, timing, specific actions, location), and clear for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The County is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

Response S1-12 Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of this Final EIR, for the MMRP. The MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for BIO-PDF-B through BIO-PDF-H, which were added to this Final EIR in order to provide additional environmental benefits in response to the Recommended Potentially Feasible Mitigation Measures and Recommendations provided in this letter.

Comment S1-13 Filling Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

Response S1-13 The Project Sponsor will pay any required filing fees to the Los Angeles County Clerk at the time the Notice of Determination (NOD) is filed in accordance with California Code of Regulations, tit. 14, section 753.5, Fish and Game Code, section 711.4, and Public Resources Code, section 21089.

Comment S1-14 Conclusion

We appreciate the opportunity to comment on the Project to assist Metro in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that Metro has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or Felicia.Silva@wildlife.ca.gov.

Sincerely,

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

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References:

[CDFWa] California Department of Fish and Wildlife. 2023. Species of Special

Concern.
Available from: https://wildlife.ca.gov/Conservation/SSC

[CDFWb] California Department of Fish and Wildlife. 2023. Submitting Data to the CNDDB.
Available from: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data

Ogden, L. J. E. 1996. Collision course: The hazards of lighted structures and windows to migrating birds. Toronto, Canada.

[TCD] Thousand Cankers Disease. 2022. What is Thousand Cankers? Accessed at: http://thousandcankers.com/.

[UCANR] University of California Agriculture and Natural Resources Division. 2022. Invasive Shot Hole Borers. Accessed at: https://ucanr.edu/sites/eskalenlab/?file=/avocado.html.

[UCIPM] University of California Statewide Integrated Pest Management Program. 2013. How to Manage Pests. Pests in Gardens and landscapes. Goldspottted Oak Borer. Accessed at: http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html.

Wood, E. M., and S. Esaian. 2020. The importance of street trees to urban avifauna. Ecological Applications 30(7): e02149. 10.1002/eap.2149.

Response S1-14 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments raised in this letter are provided in Responses S1-2 through S1-13, and in S1-15.

Comment S1-15

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
Mitigation Measure		**Timing**	**Responsible Party**
MM-BIO-1-Operational Impacts	The DEIR shall include measures to mitigate for collision impacts with the cables, gondola cars, stations, and towers. Metro will develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address any bird collisions that may occur. This Plan shall prescribe the following: 1. Measures to allow birds to see structures during low light hours. Artificial lighting should be eliminated where unnecessary as to prevent attracting birds or shielded down where possible. The DEIR will investigate different types of lights and lighting regimes with reference to their effect on the safety of migrating birds; 2. Measurable goals and success criteria that eliminates or reduces collisions to the maximum extent feasible. Measurable success criteria shall be based on site/habitat conditions prior to Project operations. Collisions shall be eliminated for fully protected species as no take can occur for these species; 3. Contingency measures if the success criteria is not met; 4. Long-term monitoring for at least 10 years; 5. Adaptive management techniques.; and 6. Annual reporting criteria and requirements.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-2-Operational Impacts	Any windows in station, tower, or gondolas will be made visible to birds in flight. This may be achieved by using non-reflective tint or window film. Reflective surfaces shall be reduced as much as possible with opaque or translucent surfaces.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-3-Burrowing Owl	Burrowing owl protocol surveys shall be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. Surveys for burrowing owls shall adhere to survey methods described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation prior to issuing construction permits (CDFW 2012). In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct 4 survey visits: 1) at least one site visit between February 15 to April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after 15 June.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
Mitigation Measure		**Timing**	**Responsible Party**
	If burrowing owls are identified utilizing the Project site during the surveys, Metro shall prepare an Impact Assessment in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Then, Metro shall develop a Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Metro shall contact CDFW to develop appropriate mitigation/management procedures. Metro shall submit a final Burrowing Owl Mitigation Plan to Metro prior to the issuing of construction permits.		
MM-BIO-4-Burrowing Owl	Metro shall disclose the length of time for temporary impacts to burrowing owl habitat. Based on those temporary impacts, Metro will mitigate for temporary and direct impacts to burrowing owl. There should be no net loss of burrowing owl habitat. Metro should set aside replacement habitat offsite for acreage of impact and number of burrows. Replacement habitat should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-5-Burrowing Owl	Metro shall avoid using any rodenticides and second- generation anticoagulant rodenticides during Project activities.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-6-Tree Disease Management Plan	An infectious tree disease management plan shall be developed and implemented prior to initiating Project activities. All trees scheduled for removal shall be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
Mitigation Measure		**Timing**	**Responsible Party**
MM-BIO-7-Tree Replacement	Given that the DEIR does not provide justification for how the mitigation ratios presented would adequately reduce Project impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors, CDFW recommends replacing native trees with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees. CDFW concurs with the replacement ratio for the Mexican elderberry	Prior to Construction and/or ground disturbing activities	Metro
REC-1- Phased Tree Removal	CDFW recommends Metro consider phased removal of trees (i.e., phased Project approach) in order to minimize impacts resulting from the temporal loss of trees and to provide structurally diverse tree replacement habitat while mitigation for impacts to tree removal occurs. CDFW recommends providing nesting perch structures in the interim of replacement trees being installed so as no nesting habitat is lost during construction. Perches must be installed at an appropriate distance from the work area to reduce impacts to nesting birds.	Prior to Construction and/or ground disturbing activities	Metro
REC-2-Nesting Birds	It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.	Prior to Construction and/or ground disturbing activities	Metro
REC-3-Fencing	CDFW recommends that any fencing used during and after the Project be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence should be avoided or minimized as this type of fencing can injure wildlife or create barriers to wildlife dispersal. All hollow posts and pipes should be capped to prevent wildlife entrapment and mortality. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
Mitigation Measure		**Timing**	**Responsible Party**
	Fences should be installed in a manner that excludes any wildlife from entering the work zone (i.e., embedded fence such that wildlife cannot enter from under the fence). Fences should not have any slack that may cause wildlife entanglement.		
REC-4-Data	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e. California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Field Survey Forms (CDFW 2023b). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The County should provide CDFW with confirmation of data submittal.	Prior to Construction and/or ground disturbing activities	Metro

Response S1-15 While the proposed Project would not have significant impacts to biological resources after the implementation of mitigation as identified in the Draft EIR, the proposed Project would incorporate additional Project Design Features (PDFs) to further reduce the already less than significant effects and to provide additional environmental benefits. In response to CDFW's comments, an addition to the Draft EIR has been provided for to incorporate BIO-PDF-B through BIO-PDF-H. This addition has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Refer to Response S1-6 for a discussion of how the proposed Project will incorporate BIO-PDF-B and BIO-PDF-C in response to recommended measures MM-BIO-1 and MM-BIO-2 provided in this comment. Refer to Response S1-7 for a discussion of how there is no suitable habitat for burrowing owls in the BSA, and no known occurrences of burrowing owls are documented in the BSA such that the proposed Project would result in less than significant impacts related to burrowing owls, and therefore the proposed Project need not implement the recommended measures MM-BIO-3 and MM-BIO-4 provided in this comment. Refer Response S1-7 for a discussion of how the proposed Project will incorporate BIO-PDF-D in response to recommended measure MM-BIO-5 provided in this comment, requiring that the proposed Project avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Refer to Response S1-8 for a discussion of how the proposed Project will incorporate BIO-PDF-E, BIO-PDF-F, and BIO-PDF-G in response to recommended measures MM-BIO-6, MM-BIO-7, and REC-1 provided in this comment. Refer to Mitigation Measure BIO-B, provided in Section 3.4.6, Mitigation Measures, of the Draft EIR, for measures that would be implemented to avoid impacts to nesting birds, including nesting buffers and other monitoring requirements in response to REC-2 in this comment. Refer to Response S1-10 for a discussion of how the proposed Project will incorporate BIO-PDF-H in response to REC-3 provided in this comment. Refer to Response S1-11 for a discussion of how the proposed Project's qualified biologist will report all special status species (including Federal or California Threatened or Endangered species, and California Species of Special Concern) documented within the BSA during the development of the proposed Project EIR to the California Natural Diversity Database (CNDDB) by completing and submitting CNDDB Field Survey Forms (CDFW 2023b), consistent with REC-4 provided in this comment.

Comment Letter S2 – CA Department of Parks and Recreation

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S2

Comment S2-1 Dear Mr. Zelmer,

The California Department of Parks and Recreation (State Parks) welcomes the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Aerial Rapid Transit Project (Project). State Parks is a State Agency as defined by the California Environmental Quality Act (CEQA) and our mission is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation.

State Parks and its partners spent more than 20 years planning, developing, and protecting the Los Angeles State Historic Park (LASHP). This park provides the city and surrounding communities with much-needed public open space and iconic views of downtown, opportunities for civic engagement and public programming on the cultural significance and diversity of greater Los Angeles, all while also protecting valuable historic resources within the urban core of Los Angeles.

The LASHP has also become a popular venue for special events, large and small, drawing visitors from all over the world. While State Parks recognizes that the Project is expected to result in numerous public benefits, including traffic reduction, better air quality, and improved transportation connectivity for the surrounding communities, all of which are consistent with the state's broad environmental goals and supported by State Parks, it will also impact LASHP operations in significant ways, as described in more detail below.

Response S2-1 This comment provides a general introduction to the comments raised in this letter. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. The planning, developing, and efforts made by State Parks and its partners resulted in a park that provides the "a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles" for the surrounding community, greater Los Angeles, and visitors from around the world, one that the proposed Project is designed to honor and expand upon.[1] As noted in the comment, the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air

[1] California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005, p. 68.

Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. In addition, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and park amenities. Refer to Response S2-2 for a discussion of the minimal ways the proposed Project would affect park operations. Through continued collaboration with State Parks and other stakeholders, the proposed Project benefits would outweigh those affects and would be a net benefit for visitors to the park.

Comment S2-2 The proposed project, with respect to the LASHP, includes a station for loading and unloading passengers at the southern entrance of the park, with ropeways and cabins traversing the southwestern edge of the park, connecting the LASHP station with a junction tower just outside of the park on the other side of Broadway. In total, the Project would require permanently taking approximately 0.21 acres for the physical transit station, and up to 1.87 acres of the 32-acre park (6%) that would be restricted

not only by the station, but by the overhead development and operational rights for the aerial infrastructure, including the cable ropeway, which would be suspended at just 26 feet over the park at its lowest spot. If constructed, the Project would require the demolition of park improvements in the project area, with additional areas to be impacted in the event these improvements, such as the Cargo Snack Shack concession and restrooms, are relocated to other areas of the park. Furthermore, a number of trees will need to be removed and the areas under the ropeway will need to be kept clear of vegetation and structures over a certain height, thus reducing the available park space for event organizers and public park users, potentially limiting the size and scope of future events.

Response S2-2 As discussed in Section 2.0, Project Description, Section 3.16, Recreation and Parks, and Section 5.0, Other CEQA Considerations, of the Draft EIR the proposed Project's Chinatown/State Park Station would be integrated into the southern boundary of the Los Angeles State Historic Park, and the proposed Project alignment crosses over the westernmost edge of the park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The station would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park (including the 2,195 square foot footprint in the park). The proposed Project's required horizontal aerial clearance width over the park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, plus an Additional Separation Buffer.[2] As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment, which is above mostly hardscaped, landscaped, and grassy areas along the westernmost edge of the park. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms however, proposed Project construction would affect the current location of its outdoor seating area. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative

[2] Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer.

seating locations during construction. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The proposed Project includes new park amenities, including approximately 740 square feet of new concessions, 770 square feet of new restrooms, and a 220 square foot covered breezeway connecting the new concessions and restrooms. These amenities would be operated by the Los Angeles State Historic Park and/or the operator as determined by the Los Angeles State Historic Park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department, including the General Plan Amendment. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment S2-3 As noted in the DEIR, the Project is not consistent with the LASHP General Plan, which would need to be amended prior to State Parks granting any administrative approvals. Authority for approving such state park general plan amendments rests solely with the State Park and Recreation Commission (SPRC). While the project applicant would be responsible for submitting a general plan amendment document that meets State Parks' requirements and policies for such proposals, State Parks would also be responsible for analyzing and making recommendations to the SPRC. State Parks understands that the thresholds under CEQA and the required record and analysis for a general plan amendment are different.

Response S2-3 As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by

the State Park and Recreation Commission, which retains its independent authority related to the proposed Project. The General Plan Amendment process would include additional public processes before the Commission. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to less than significant. Refer to Topical Response F, Los Angeles State Historic Park, for discussion of how State Parks has the authority to grant the necessary approvals for the proposed Project consistent with the park's General Plan. State Parks will undertake its own review of the proposed Project when the Project Sponsor seeks approvals for its use of Los Angeles State Historic Park from State Parks, including during the General Plan Amendment process under the authority of the State Park and Recreation Commission.

Comment S2-4 However, State Parks recommends that the project applicant further analyze the following impacts in the DEIR: (1) the substantial loss of property within LASHP;

Response S2-4 Refer to Response S2-2 regarding the Chinatown/State Park Station and proposed Project alignment within the Park. As discussed in Section 3.16, Park and Recreational Facilities, of the Draft EIR, the construction and operational impacts of the proposed Project would result in less than significant impacts to the park under CEQA. The Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would overhang 9,320 square feet of the park (including the 2,195 square foot footprint). The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required horizontal aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park (~1.4 million square feet), plus an Additional Separation Buffer. While the Chinatown/State Park Station's footprint will occupy 2,195 square feet within the park, through continued collaboration with State Parks which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from, the park's purpose and objectives. For example, in addition to the concessions, restrooms, and breezeway discussed above, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. In addition, the station canopy would provide much needed shade. As discussed in

Topical Response F, Los Angeles State Historic Park, the Project Sponsor would work with State Parks through the General Plan Amendment process to develop an "Interpretation Plan" to identify unique ways to use the proposed Project to provide interpretation for the park and its history. The Interpretation Plan would help ensure that the proposed Project is a benefit to Los Angeles State Historic Park by providing visitors with, consistent with the park's existing General Plan, an engaging and informative experience that deepens their understanding and appreciation of Los Angeles State Historic Park's culture and history as a former transportation hub.

Comment S2-5 (2) the impairment of scenic viewsheds and high-value open space; and

Response S2-5 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to the park, which would be less than significant. As discussed therein, the Draft EIR and Visual Impact Assessment specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds of or from the Los Angeles State Historic Park. The Draft EIR studied thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park:

- KOP 12: Looking North on Alameda Street/Spring Street from South of College Street
- KOP 15a: Looking Northeast from Spring Street adjacent to Metro L Line (Gold)
- KOP 15b: Looking Northeast from Spring Street near Southernmost Entrance to Los Angeles State Historic Park
- KOP 16a: Looking Southwest from Southwestern Portion of Los Angeles State Historic Park
- KOP 16b: Looking Southeast from the Southwestern Portion of Los Angeles State Historic Park
- KOP 17: Looking Southwest from Roundhouse within Los Angeles State Historic Park
- KOP 18: Looking Southwest from Spring Street adjacent to Los Angeles State Historic Park
- KOP 19: Looking Southwest from within Los Angeles State Historic Park
- KOP 20: Looking Southwest from North Broadway historic bridge

The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However,

the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park.

The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park.

Nevertheless, in response to this comment, the Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the preparation of the supplemental KOPs, and the analysis of the supplemental KOPs, respectively. As demonstrated by the analysis of the simulated views in these supplemental KOPs, views from the park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

The Draft EIR also analyzed the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics (see pages 3.11-39 to 3.11-41). As detailed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, consistent with the General Plan's Aesthetic Goal, the proposed Project would protect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources. The proposed Project's design would incorporate appropriate urban design elements at the neighborhood level, preserve natural viewsheds of hillside areas, and protect additional open space and aesthetics resources consistent with policies from the Los Angeles State Historic Park General Plan.

The proposed Project's design and building materials would complement the architectural themes of the neighborhood and would complement the visual character of the existing buildings in the area. The Chinatown/State Parks Station's location would not block any designated scenic vistas, alter scenic resources, or block panoramic views. Additionally, potential impacts to visual quality and character are minimized by the location of the Chinatown/State Park Station, which is in the southernmost portion of the park, away from the open passive park areas (discussed further below).

The proposed Project components would consist of a modern architectural design, which would complement the existing modern style buildings in this area. In addition, the neutral light-tone gray of the proposed Project components would be consistent with modern structures in the surrounding urban environment. The new amenity building intended for use by proposed Project riders and park visitors alike are designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Further, consistent with Los Angeles State Historic Park General Plan Aesthetic Guideline 1, the Project Sponsor has taken steps to further minimize the effects of the proposed Project on the park's visual resources and high-value open space. This has included collaboration with State Parks resulting in selecting a primary alignment along the western edge of Los Angeles State Historic Park, rather than through the middle of the park, in order to reduce visual and other Park impacts. Additionally, the Project Sponsor worked with State Parks to determine the new location of the Chinatown/State Park Station to improve pedestrian flow into the park and what other improvements would further enhance the experience of visitors (e.g., increased landscaping and hardscaping, new restrooms and concession areas, etc.). This resulted in moving the station to the southernmost edge of the park.

As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on the park, including reducing the size and scale of the station to be further in line with the neighborhood characteristics, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project, including in the Los Angeles State Historic Park. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation, and operational noise impacts would be less than significant.

Comment S2-6 (3) project impacts that will constrain and reduce the ability to utilize the LASHP for special events.

Response S2-6 Refer to Response S2-2 regarding the Chinatown/State Park Station and proposed Project alignment within the Park. As discussed in Section 5.5.2, Special Events at the Los Angeles State Historic Park, in Section 5.0, Other CEQA Considerations, of the

Draft EIR, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for special events and activities that use significant airspace (e.g., concerts with tall screens and kite flying) would not be affected by the proposed Project. Additionally, other special events that do not use significant airspace (e.g., craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market) and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. In addition, the access road currently used for event set-up and breakdown would continue to be available for use. The proposed Project could affect the ability to use areas directly beneath the alignment for certain specific special event structures, however, the proposed Project alignment over the park is largely over a hill where it is difficult to stage special events, and the park does not include in their planned locations for special events. Due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project does not significantly reduce the event space area within the Los Angeles State Historic Park or limit the number of people that can attend events at the park. Coordination as to operation of special events at the Los Angeles State Historic Park and the proposed Project are anticipated to be addressed in operational agreements related to the park.

Comment S2-7 Other impacts such as, but not limited to, hours of operation, design and materials of facilities, and access during construction, are also meaningful issues that will need to be discussed further during the general plan amendment process before the SPRC.

Response S2-7 Coordination as to operational issues such as hours of operation are anticipated to be addressed in operational agreements related to the park. Refer to Sections 2.0, Project Description, 3.16, Parks and Recreational Facilities, and 5.0, Other CEQA Considerations, for further discussion of operational considerations such as the dual-gate design that will ensure that park areas would not be accessible once the park is closed.

Regarding the proposed Project design and the materials used for the Chinatown/ State Park Station and the park amenities, as discussed in Section 2.0, Project Description, and Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would not adhere to a fixed, Procrustean design across the entire system, but each individual component would be designed to weave seamlessly into the surrounding urban fabric, and the colors and material finishes of each station and junction would be chosen to be complementary to each of their respective sites. The Project Sponsor would work with State Parks and its stakeholders to select a design and materials for the Chinatown/State Park Station and the park amenities to seamlessly integrate into and complement the park's surroundings.

As discussed in Section 3.16, Parks and Recreational Facilities, of the Draft EIR, construction of the Chinatown/State Park Station would require the temporary closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during the approximately 19 months construction duration for the Chinatown/State Park Station. While there would be a temporary closure, access to the park would be maintained as there are various access points (e.g., at the intersection of Sotello and North Spring Street) to Los Angeles State Historic Park. Construction of the Chinatown/State Park Station would not require any closures of areas used for recreation; however, it would affect the current location of the outdoor seating area associated with the park concessionaire. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities.

The Project Sponsor would continue to collaborate with State Parks and other stakeholders to ensure adequate vetting and consensus around the benefits from the proposed Project.

Comment S2-8 Should the General Plan be successfully amended to include the Project, State Parks looks forward to working collaboratively with the Project team to identify appropriate operational agreements, transactional terms, and other measures needed to ensure the benefits of the Project outweigh the impacts, direct and indirect costs, and specifically, ensure that LASHP visitors' overall experiences will be improved as a result.

Sincerely,
Jason De Wall
Northern Field Division Chief
cc: Kathy Amann, Deputy Director

Response S2-8 The Project Sponsor shares State Parks' objective to ensure that Los Angeles State Historic Park visitors' overall experiences will be improved as a result of the proposed Project and believes that through continued collaboration, that objective will be met.

Comment Letter S3 – CA Department of Highway Patrol

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S3

Comment S3-1 To whom it may concern:

I was recently requested to perform an Environmental Impact Review for a project involving the Los Angeles Aerial Rapid Transit system. Specifically, a gondola aerial system that would transport pedestrian traffic from Los Angeles Union Station to Dodger Stadium.

Response S3-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment S3-2

S3-2A The California Highway Patrol's interest in commenting surrounds our concern for vehicular traffic traveling on the State Route (SR) 110 freeway. Our concerns include increased traffic congestion in the area due to the visual hazard of gondola cabins, the possibly of projectiles being thrown onto the freeway from pedestrian's traveling within gondola cabins, and increased calls for service in the area of the gondola to remove objects being thrown from gondola cabins.

S3-2B Due to the aforementioned concerns, we feel this project, if approved, would adversely affect the Central Los Angeles Area and vehicular traffic within the area.

If you need further assistance, please contact the administrative sergeant, Sergeant J. Allen, at (213) 744-2231.

Sincerely,

J.I. Perry, Captain
Commander
Central Los Angeles Area

Enclosure(s)

Cc: Southern Division
Special Projects Section, Transportation Planning Unit

Response S3-2

S3-2A Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 3.01, Aesthetics, and

Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to motorists, which would be less than significant. The methodology utilized to examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). As discussed on page 3.1-12, viewer exposure for motorists is low due to the short duration of views and high travel speeds of vehicles. Viewer sensitivity for motorists is considered low due to the task or demand of paying careful attention to the road ahead. Moreover, as discussed on page 3.1-50, motorists traveling on SR-110 would have fleeting and/or temporary views of the Project components. Refer to Topical Response K, Signage and Lighting, for discussion of how no digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition, the bottom of cabins would be 89 feet above northbound SR-110 and 98 feet above southbound SR-110, with the gondola cables 109 feet above northbound SR-110 and 118 feet above southbound SR-110. As discussed in Section 2.0, Project Description of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing vehicle miles traveled.

S3-2B This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Response S3-2A.

Comment Letter S4 – Caltrans

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of this Final EIR, for reference.

Responses to S4

Comment S4-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would connect LA Union Station to the Dodger Stadium property via an aerial gondola system with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while connecting surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The aerial gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, three towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately 7 minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Response S4-1 This comment is noted and will be provided to the decision makers for review. Metro appreciates the California Department of Transportation (Caltrans) preparing comments on the Draft EIR. The comment includes a summary of the project description and does not address an environmental issue or raise a substantive issue regarding the content of the Draft EIR. No further response is warranted.

Comment S4-2 The nearest State facility to the proposed project is SR-110. After reviewing the DEIR, Caltrans has the following comments:

Based on the information provided, Caltrans supports Design and Use option E, as it provides a much-needed bike and pedestrian bridge connecting North Broadway to the Los Angeles Historic Park. This connection is critical to the project's success, as it will allow the residents, employees, and students north of the Metro L line tracks to access the park and its new station. This not only improves the potential ridership for the proposed project but provides a greatly enhanced active transportation network for all Californians who will ever visit, live, or work in the area. For these reasons

Caltrans would also discourage the selection of Use Option D, which would substitute the proposed Chinatown/State Park Station for a non-passenger junction. This option greatly reduces the project's effectiveness, and needlessly limits accessibility to an additional mode of travel to and from a valuable green space.

Response S4-2 This comment indicating support for the proposed Project Design and Use Option E (the Los Angeles State Historic Park Pedestrian Bridge), and lack of support for Use Option D (Chinatown/State Park Station as a Non-Passenger Junction), is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the State Park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge. As discussed in Section 6.0, Design and Use Options, of the Draft EIR, as Use Option D would not include passenger access, it would not meet a majority of the proposed Project's objectives associated with the Chinatown/State Park Station. For example, Use Option D would not enhance community connectivity to the Los Angeles State Historic Park or provide comparable, affordable, and accessible fare opportunities for the community and Los Angeles State Historic Park, as the Chinatown/State Park Station is the closest in proximity to Los Angeles State Historic Park. Several comments on the Notice of Preparation requested an intermediate station closer to Chinatown to be located at the current Metro L Line (Gold) station to bring business into the commercial area and to offer another travel mode choice so as to alleviate parking problems in the area. It is also anticipated that, under the proposed Project, approximately 15 percent of passengers would access the Chinatown/State Park Station on game days or during events at the Los Angeles State Historic Park. However, under Use Option D, no station access would be provided to the core of Chinatown, the Mission Junction neighborhood, or the Los Angeles State Historic Park. Further, the Chinatown/State Park Station as a non-passenger junction under Use Option D would not enhance transit access to surrounding communities, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway. As such, if the Chinatown/State Park Station were to operate as a non-passenger junction under Use Option D, it would not provide transit benefits to the public.

Comment S4-3 Finally, due to the Stadium Tower's proximity to Caltrans right-of-way and the direct aerial crossing of SR-110, the project will require extensive collaboration with Caltrans staff for various permits and design approvals. These reviews, approvals, and encroachment permits will be conducted at the time of permit application so that all concerns can be adequately addressed. If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-04095.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: State Clearinghouse

Response S4-3 As discussed in Section 1.0, Introduction, of the Draft EIR, and Topical Response D, Metro is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, Caltrans is a responsible agency for the proposed Project and, as discussed in Section 2.0, Project Description, of the Draft EIR, the Project Sponsor will seek review and approval from Caltrans for any required permits or approvals for the proposed Project. Metro appreciates Caltrans' willingness to collaborate with Metro on the proposed Project.

Comment Letter S5 – Gabrieleno/Tongva San Gabriel Band of Mission Indians

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to S5

Comment S5-1 We are writing this letter out of extreme concern for the proposed LA Gondola Project. The building of the Gondola will greatly impact current open space, disturb wildlife and cause disruption at LA Historic Park. Our tribal council and local Gabrieleno Tongva Community are against this project.

Response S5-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The Draft EIR analyzed Tribal Cultural Resources in Section 3.18, Tribal Cultural Resources. Metro consulted with California Native American Tribes as required by CEQA in accordance with Assembly Bill 52, including the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant, including in the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems,

discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment S5-2 As a tribe, we have very little space within Los Angeles County to gather as community and to enjoy outdoor space. Unfortunately, the capitalistic opportunity will cause more than disruption, but it will also further damage to Mother Earth and our natural world environment.

Response S5-2 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to the Los Angeles State Historic Park. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment S5-3 We ask you to please stop the project. The traffic, and unnecessary construction that will further the damage to our planet will not improve our lives, traffic conditions or lives as Angelino's. This proposal is just another poorly short-sighted business venture that will leave our city and county in a worse situation than what we are currently experiencing.

Sincerely,
Kimberly M. Johnson
Tribal Secretary.

Response S5-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition, refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter L1 – Evelyn Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to L1

Comment L1-1 South Coast AQMD staff received the Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles Aerial Rapid Transit Project (South Coast AQMD Control Number: LAC221018-05). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 10/17/2022 – 12/16/2022.

Response L1-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response L1-2.

Comment L1-2 Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and associated Appendices on METRO's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

1. CalEEMod Input Files (.csv files);
1. Live EMFAC output files;
1. Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources;
1. AERMOD Input and Output files, including AERMOD View file(s) (.isc);
1. HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
1. Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by 10/27/22. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you,

Evelyn Aguilar

Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: 909-396-3148
E-mail: eaguilar@aqmd.gov

Response L1-2 Documents responsive to this request were provided to the South Coast Air Quality Management District on October 28, 2022.

Comment Letter L2 – City of Los Angeles, City Administrative Officer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to L2

Comment L2-1 I am writing to comment on the Draft Environmental Impact Report (DEIR) that Metro released on the Aerial Rapid Transit Project. Specially, I am informing Metro that the properties at 901 and 903 North Main Street, Los Angeles, California, 90012 (Assessor's Parcel Number [APN] 5408-008-909) are owned by the City of Los Angeles (City) and were approved for mixed use development -- affordable housing and services -- by the Mayor and City Council in August 2019 (Council File Number: 18-0930).

Response L2-1 This comment provides a general introduction regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses L2-2 through L2-3. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of how the Homeboy Industries' anticipated housing project at 903 North Main Street was considered a related project in the Draft EIR, and accordingly the proposed Project's Alpine Tower's location considered and avoided the anticipated 903 North Main Street Homeboy Industries' housing project. The proposed Project does not impact Homeboy Industries' anticipated housing project.

Comment L2-2 The Los Angeles Housing Department currently has an Exclusive Negotiation Agreement (ENA) with Friends of Homeboy, LLC, for these properties and expects to execute the Development and Disposition Agreement no later than June 2023. The plan for these sites includes transitional housing and affordable housing with supportive services, and a community center. Because of these facts, the City does not intend to divest itself of these parcels for any use besides providing affordable housing.

Response L2-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing for a discussion of how the proposed Project does not impact Homeboy Industries anticipated housing project. As detailed in Topical Response E, development of housing is constrained on the portion of 901 North Main where the proposed Alpine Tower would be located due to the proximity to the Metro L Line (Gold) tracks. The proposed Alpine Tower would be located on a triangular portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets, and this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing. Specifically, the City recognized that the 901 North Main Street "site is bisected by overhead tracks, which are protected by an easement to" Metro and therefore "the Metro tracks will affect the ability to develop on the site." According to the City's publicly available property information system, ZIMAS, development and

construction projects on 901 North Main Street must consult with Metro pursuant to Metro's Adjacent Development Review process to ensure safety and avoid conflicts to transit services and operations. The process applies to work within 100 feet from Metro right-of-way, which affects most or all of the 901 North Main Street property.[3] In addition, compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street.

Comment L2-3 Thank you for your immediate attention to this matter. If you require additional information, please contact Assistant City Administrative Officer, Yolanda Chavez, at 213-473-7522 or Yolanda.Chavez@Lacity.org.

Sincerely,

MATTHEW W. SZABO
City Administrative Officer

cc: Mayor Karen Bass
Councilmember Eunisses Hernandez, District 1
Los Angeles Housing Department

Response L2-3 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses L2-1 through L2-2.

[3] The 903 North Main Street property is also located within this area, according to ZIMAS. City of Los Angeles. 2023. ZIMAS. Available at: https://zimas.lacity.org/. Accessed August 2023.

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FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

December 2023

State Clearinghouse No. 2020100007

VOLUME II

Prepared for:

Los Angeles County Metropolitan Transportation Authority

Metro

Prepared by:

Kimley-Horn

Kimley»Horn

Expect More. Experience Better.

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Comment Letter GO1 – Historic Cultural North Neighborhood Council, Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO1

Comment GO1-1 A resident who only has a landline asked me to find out if he can call into the LA ART DEIR public hearing tomorrow using one of Zoom's toll free numbers. The phone number provided is the San Jose phone number, which would cost him over 20 cents per minute for the call.

Will the toll free phone numbers work for joining the Zoom meeting?

Thanks,

Phyllis Ling

Historic Cultural North Neighborhood Council
Outreach Committee Chair • Solano Canyon Resident Representative
Email: pling.hcnnc@gmail.com
Website: hcnnc.org
Subscribe: hcnnc.org/subscribe

Response GO1-1 An email responding to this request with Zoom's toll-free dial in numbers was sent to the commenter on December 13, 2022.

Comment Letter GO2 – CCA, Jessica Lall

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO2

Comment GO2-1 Dear Mr. Zelmer,

CCA represents over 300 businesses, non-profits and trade organizations with a shared commitment to Downtown's vibrancy and increasing opportunity in the region. We are writing in support of the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART) that would connect Union Station to Dodger Stadium. The concept offers significant potential benefits to the City of Los Angeles and the broader communities of Los Angeles County by removing cars off the road, increasing access to public transit and improving air quality. It is also a key example of next generation transportation systems that will be critically important for LA's clean air future, which will require revolutionizing transportation on a scale not seen since the introduction of automobiles. LA ART has the potential to substantially improve traffic safety and facilitate mobility, while reducing traffic congestion and fuel consumption.

Response GO2-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, for an overview of how the proposed Project would provide a safe, sustainable, high-capacity zero emission aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. As discussed in Section 2.3.7, Purpose and Need, of the Draft EIR, Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment GO2-2 The emissions reductions from this permanent transit link, with its game-day capacity of 10,000 to 12,000 Dodger Stadium visitors, could benefit local communities by replacing up to 3,000 existing car trips before and after each Dodger game and Stadium event. In addition, the project's year-round operation opportunities can increase transit access for underserved communities and increase access to parks.

Response GO2-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response GO2-1. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, and Topical Response N, Environmental Justice, for discussion of how the proposed Project would provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Moreover, transfers to and from the Metro regional transit system and the proposed Project would be free. In addition, the Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, students fares, etc.). Residents and employees of businesses located within the communities adjacent to the proposed Project alignment would only pay the rate they pay to ride the Metro system. To facilitate this transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge.

Comment GO2-3 Projects like these are important in addressing climate change and as an opportunity to create local jobs and economic opportunities for our communities, which is critically important as we look to move into the pandemic recovery phase and toward the future, including planning for the 2028 Olympics in Los Angeles.

We are pleased to support the LA ART project, recognizing the significant benefits potential from a successful project, and hope the approvals can be completed to realize the LA ART project's benefits in time for the 2028 Olympics.

Sincerely,

Jessica Lall
President & CEO

Response GO2-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response GO2-2 regarding the proposed Project's ability to reduce greenhouse gases through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would positively impact the economy by creating jobs and how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter GO3 – Los Angeles Latino Chamber of Commerce, Darrel Sauceda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO3

Comment GO3-1 I would like to go on the record, that the LALCC is recommending, that this project hire at least 35% local small diverse business, to not only construction but to provide maintenance and staff thru Local American Job centers of California (AJCC)

Darrel A. Sauceda

Chief Operating Officer
8531 Wellsford Pl., Suite E
Santa Fe Springs, CA. 90670
562-464-0880 Office : 562-464-0884 fax
562-556-6492 cell

Response GO3-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for a discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter GO4 – Los Angeles Union Station Historical Society, Thomas R. Savio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO4

Comment GO4-1 Dear Mr. Zelmer,

The Board of Directors (The Board) of the Los Angeles Union Station Historical Society (LAUSHS), a non-profit, Section 106 designated historic preservation consultant for Los Angeles Union Station (Union Station), a world recognized National Historic Landmark owned by Los Angeles County Metropolitan Transit Authority (LA Metro), has voted to formally comment against Los Angeles Aerial Rapid Transit's (LA ART) private, for-profit "gondola" (cable car system) and public land and air rights development scheme that proposes to link Union Station and LA Metro's supporting "Esplanade" project with Dodger Stadium that The Board believes is an unfair and illegal (pending a Superior Court decision) "accommodation" for LA ART. The Board believes that LA ART's proposed "futuristic-style" Union Station Terminal on Alameda Street and LA metro's supporting "Esplanade" project will blight the historic and architecturally significant west facade of Union Station, and that Union Station, its passenger trains and patrons could be physically harmed in aircraft from the nearby Los Angeles Police Department's "Hopper Memorial Heliport" airport become entangled in LA ART's overhead cables and towers. Furthermore, The Board opposes LA Metro's planned removal of all "Disabled Parking" spaces from the "Esplanade" area, without public hearings or reasonable alternatives, to accommodate a new so-called "water feature" (aka a fogging-type water fountain) which is intended to cool LA ART riders cued-up for their rides to Dodger Stadium. Moreover, the water feature would be contrary to the state's water conservation policy. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

Until now, The Board has steadfastly refused to take sides in the above major, multi-million-dollar development scheme. However, in The Board's opinion LA Metro and its staff have obviously taken a pro-active role supporting LA ART, a potential competitor of LA Metro's efficient "Dodger Express" motor coach service, as well as planning to "gild the lily" of Union Station with its "Esplanade" project, all "backstage," using the public land and airspace without public discussion and participation as required by LA Metro policy and law.

Response GO4-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO4-2 through GO4-9.

Comment GO4-2 Among the reasons for The Board's opposition are, but not limited to:

A) LA Metro Board member Mayor Eric Garcetti, who introduced the motion to assist LA ART without public discussion or participation and to enlist LA Metro staff to "carry LA ART's water," i.e., facilitate it, did receive, according to public records, millions of dollars in both "behest payments" and political cash contributions from real estate and LA ART "gondola" developer Frank McCourt and/or his various entities and associates, which in The Board's opinion, is an apparent conflict of interest. Consequently, LA Metro is being sued by the non-profit California Endowment for willfully preventing public discussion and participation in the decision to partner with LA ART.

Response GO4-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. This comment also raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment GO4-3 B) In The Board's opinion, LA Metro Deputy Executive Officer Cory Zelmer falsified an official document—LA ART's Draft Environmental Impact Report—by ticking-off the DEIR box that states there is no airport within two miles (or 3520 yards) of LA ART's proposed LA ART Union Station Terminal, when he had been informed repeatedly to the contrary by The Board. The Board presented proof to Zelmer and his superior, LA Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport"—variously described as the country's or the world's

busiest airport for rotary-winged aircraft (aka helicopters) –is only 880 yards from LA ART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer and Wiggins, that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports, i.e., a location where any type of flying machine is serviced. The fact that some airports serve only rotary-wing aircraft while others serve both rotary-wing aircraft and fixed-wing aircraft (airplanes) does not change the fact that all "heliports" are "airports" in the eyes of the governing agencies and the Federal Courts.

Furthermore, the argument that Hooper Memorial is a police airport, not a civilian airport, and therefore not an airport as far LA ART's DEIR is concerned, is fallacious and spurious. Any aircraft that becomes entangled in LA ART's cables and 13-story towers and thus crashes into Union Station, its trains and patrons would cause catastrophic harm regardless had that aircraft launched from a police airport or a public airport. Simply put, LA ART's proposed location is not safe for Union Station and Hooper Memorial Heliport airport.

"General Notice A. Safety is of the first importance in the discharge of duty."

--Los Angeles Union Passenger Terminal Rules and Regulations

Response GO4-3 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus, comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, and concludes with substantial evidence that construction and

operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment GO4-4 C) Contrary to the promises made to The Board by Stephanie Wiggins, Cory Zelmer, and LA ART, no meeting has ever been organized between them and The Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LA ART's Union Station Terminal.

Response GO4-4 Refer to Response GO4-3 for a detailed discussion of Hooper Heliport. Refer to Response GO4-5 regarding the proposed Project's Alameda Station. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment GO4-5 D) LA Metro has forbidden The Board's examination of the only known 3-D scale model of Union Station's location because, in The Board's opinion, of a deliberate subterfuge the model dating from former Union Station owner—the Santa Fe Railway—is too old to be accurate today, and furthermore the sharing of the model with The Board would somehow be a "conflict of interest" even though The Board previously had access to the model in years past. However, The Board's use of the model does not depend on the model's age, but only the juxtaposition of Union Station with Alameda Street which has not changed appreciably since the station was opened in 1939. Consequently, at a loss for options, The Board asked LA ART to produce a 3-D scale model given its apparent resources, but LA ART has never responded. This "shadow play," in The Board's opinion, is being performed by LA Metro and LA ART to obfuscate the issues and delay public criticism of LA ART and contrary to the public weal which LA Metro is obliged to serve. Furthermore, since the model is public property, The Board's use should be permitted so it can be compared to LA ART's distorted, wide-angle, artist's renderings of its proposed Union Station Terminal with Union Station's Hispanic-Art Deco architectural style. Simply put, it is The Board's opinion that cable car rides belong in San Francisco and Disneyland, not in front of Los Angeles' world famous "Cathedral of Transportation."

Response GO4-5 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual

simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment GO4-6 E) In The Board's opinion, LA ART is designed to, among other things, compete with LA Metro's "Dodger Express," a highly efficient service that could be improved if LA Metro switched to modern, environmentally friendly motor coaches that it might fund by the savings from not building its Esplanade project.

Response GO4-6 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. While some riders of the Dodger Stadium Express are likely motivated by traveling in more

sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles traveled (VMT) to Dodger Stadium than the proposed Project, which would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Comment GO4-7 F) Given the seasonal nature of baseball, it is also The Board's opinion that LA ART is a "Trojan Horse" proposal to facilitate year-around for-profit real estate development in Dodger Stadium's vicinity using public land and resources.

Response GO4-7 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO4-8 G) LA Metro's proposed Esplanade project, according to LA metro employees—who wish to remain anonymous for the sake of their careers—will be funded by so-called "overlap money" that was "peeled-off" from LA Metro's defunct LINK-US project that itself was rejected because of the Board's and the public's opposition. Moreover, LA Metro has stated to The Board's Executive Director via telephone that it plans to accomplish the Esplanade project by eliminating all public parking including all "disabled parking" from the front of Union Station without public discussion or participation in violation of the Americans with Disabilities Act (ADA). Furthermore, according to a retired LA Metro staff person, the Esplanade's so-called

"water feature" (a fogging-type water fountain) will likely attract "homeless" citizens seeking showers, contrary to LA Metro's stated policy—according to former LA Metro Union Station supervisor the late Ken Pratt—of not catering to the needs of the "homeless." In The Board's opinion, The Esplanade's is designated to cool future LA ART and "Olvera Street" customers as they walk between Union Station, LA ART's terminal and the "Hispanic-style" Olvera Street tourist attraction.

(While Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street Tourist Attraction" per se was developed in the 1930s by a husband-and-wife real estate development team who went on to develop Los Angeles' "New Chinatown Tourist Attraction." Alas, historic Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled there after building the railroad to Los Angeles. Union Station was then built on top of old Chinatown's rubble.)

Response GO4-8 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment GO4-9 Moreover, erecting the Esplanade water feature, whilst semi-desert Los Angeles is experiencing one of its worst droughts in history, flies in the face of the State of California's policy to lessen environmental harm. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what The Board believes is driving the related LA ART and Esplanade schemes. To paraphrase the immortal Yogi Berra: "It's 'Chinatown' (*the movie*) all over again."

Response GO4-9 Refer to Response GO4-8 for discussion of how the proposed Project does not include a water fountain in the planned LAUS Forecourt. As described on page 2-49 in Section 2.0, Project Description, of the Draft EIR, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment GO4-10 For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society opposes construction of LA ART and LA Metro's related Esplanade project in the interests of honest government, Union Station preservation, the environment and above all safety.

Respectfully,

Thomas R. Savio
Executive Director
Los Angeles Union Station Historical Society
Cc. Stephanie Wiggins, CEO, LA Metro Karen Bass, Mayor-Elect of Los Angeles

Response GO4-10 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This

comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO4-2 through GO4-9.

Comment Letter GO5 – Los Angeles Chinatown Firecracker Run Committee, Inc.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO5

Comment GO5-1 On behalf of the Firecracker Board of Directors, I am writing to express our support for the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Chinatown to Dodger Stadium. LA ART offers significant potential benefits to the City of Los Angeles and specifically the community of Chinatown by increasing access to public transit, improving air quality by removing cars off the road, and highlighting the businesses and culture in the area.

Response GO5-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment GO5-2 This project will improve mobility and increase access to opportunity for the local community. The LA ART represents a zero-emission permanent transit link that would provide game-day capacity of 10,000 to 12,000, replacing up to 3,000 trips before and after each Dodger game and Stadium event. It would also provide year-round operation opportunities to increase transit access for underserved communities and parks.

Response GO5-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities.

Comment GO5-3 In addition, by connecting Union Station to Chinatown, LA ART would create a cultural landmark that will enhance the visibility of Chinatown and increase visitors to the

business corridor. The project represents an opportunity for businesses along Broadway and across Chinatown to create partnerships with LA ART to highlight and learn more about the attractions, culture, history, and events in Chinatown.

Response GO5-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The proposed Project would also provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project could partner, for example, with the Chinese American Museum to help in addressing visitor, educational, and customer access to the Museum. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response C, Project Features, for discussion of how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder groups. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community.

Comment GO5-4 I appreciate LA ART's diligence in working with Metro and the community to bring to life a vision for a safe, accessible transit option for the community and urge you to support this important investment for Chinatown.

Sincerely,

Raymond Su

President, Board of Directors
Los Angeles Chinatown Firecracker Run Committee, Inc.

Response GO5-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to

neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment GO5-5 List of Signatures in support for the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART)

#	Name	Title	City
1	Michelle Jong	Past President, Chinese Family History Group	Long Beach
2	clayton frech	CEO and Founder, Angel City Sports	Los Angeles
3	David Kent Gold	President, Bicycle Angels	Redondo beach
4	Evelyn Lee	President, Chinese Family History Group	Long Beach
5	Jose J. Hernandez	Principal, Ann Street Elementary	Los Angeles
6	Lisa Loo	Director – Community Services	San Gabriel
7	Jorge Parra Jr.	Educator	Los Angeles

Response GO5-5 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter GO6 – Asian Business Association, Dennis J. Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO6

Comment GO6-1 As an office tenant of Chinatown for over 5 years, we like to see our community develop and advance. Having the Aerial Rapid Transit will bring more foot traffic which will help with economic development. Chinatown is very tourist friendly and walkable. We also like to see increased security and funding from this new transit to support Chinatown shops.

On behalf of our board of directors and 1200+ members, we are in full support of the LA Aerial Rapid Transit.

Dennis J. Huang

Executive Director & CEO

*A*sian *B*usiness *A*ssociation
767 N. Hill Street, Suite 308
Los Angeles, CA 90012
(213) 628-1ABA
dennis@abala.org
www.abala.org

Response GO6-1 This comment indicating support for the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer also to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment Letter GO7 – Climate Resolve, Kellie Hawkins Davis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO7

Comment GO7-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,

Kellie Hawkins Davis
Climate Resolve Boardmember

Response GO7-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter GO8 – LA Parks Alliance, John Given

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO8

Comment GO8-1 Dear Mr. Zelmer:

This letter is submitted on behalf of LA Parks Alliance[1] with respect to the above-captioned Los Angeles Aerial Rapid Transit Project (the "Project") in response to the release of the Project's Draft Environmental Impact Report ("Draft EIR" or "DEIR"). This letter focuses on LA Parks Alliance's strong objection to Los Angeles County Metropolitan Transportation Authority ("Metro") acting as lead agency for the Project's environmental review instead of the proper lead agency, the City of Los Angeles. LA Parks Alliance will submit a more thorough comment letter regarding the Project's inadequate environmental review before the current comment deadline in January 2023.

Footnote 1: LA Parks Alliance was formed in 2019 as a response to land use threats to LA State Historic Park. Its members are park and public space advocates. See https://www.laparksalliance.org.

Response GO8-1 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro has primary responsibility for implementation of the proposed Project, and is the proper lead agency. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has not disputed this designation and has cooperated as a responsible agency.

Comment GO8-2 The City of Los Angeles Must be the Lead Agency for the Project, not Metro

Metro asserts it is the appropriate lead agency — "the public agency with the greatest responsibility for supervising or approving the project as a whole." Metro fails to offer an explanation as to how or why it should (or even can) be considered the public agency with the greatest responsibility for supervising or approving the project. Review of the relevant statutes shows Metro cannot be the lead agency because it has insufficient authority to authorize or supervise the Project. The City of Los Angeles must be the lead agency for the Project.

Footnote 2: DEIR, p. ES-1, quoting but not specifically citing Cal. Code Regs. Tit. 14 (hereinafter CEQA Guidelines), § 15051(b).

Response GO8-2 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro is the proper lead agency for the proposed Project. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project.

Comment GO8-3 A. CEQA Requires the City of Los Angeles to be the Lead Agency for the Project

Public Resources Code section 21067 defines "lead agency" as "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment." (See also CEQA Guidelines, § 15367.)

CEQA Guidelines section 15051 explains the mandatory process by which a lead agency is chosen:

> Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:
>
> > (a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.
> >
> > (b) If the project is to be carried out by a nongovernmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.
> >
> > > (1) The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution

> control district or a district which will provide a public service or public utility to the project.
>
> (2) Where a city prezones an area, the city will be the appropriate lead agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the prezoning. The local agency formation commission shall act as a responsible agency.
>
> (c) Where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the lead agency.
>
> (d) Where the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the lead agency, the public agencies may by agreement designate an agency as the lead agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

Here, there are numerous public agencies that will be involved with the project. As the DEIR acknowledges, permits and other approvals will be required from the California Department of Transportation (CalTrans), California State Parks, Cal/OSHA, the City of Los Angeles, and Metro. (DEIR, pp. 2-57, 2-61 to 62.) Guidelines section 15051 therefore applies.

There is no doubt the Project will not be "carried out" by Metro. Metro tacitly admits as much by quoting CEQA Guidelines section 15051 subdivision (b) in the DEIR, which would not apply if Metro planned to carry out the project. Subdivision (a) would instead apply and Metro would be the appropriate lead agency. (DEIR, p. ES-1.) But as all available evidence shows, Metro will *not* carry out the Project.

Response GO8-3 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO8-2 for a discussion of how Metro is the appropriate lead agency for the proposed Project, consistent with its statutory authority under Public Utilities Code section 13052. Refer to Section 2.0, Project Description, for an overview of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project. Section 2.0 outlines the various agencies that could approve aspects of the proposed Project pursuant to their regulatory and statutory authority, including Caltrans, California State Parks, Cal/OSHA, Metro, and the City of Los Angeles.

Comment GO8-4 Metro documents, created during a confidential process by which Metro determined ARTT LLC would have sole source status to construct and operate the Project, show that the Project "is envisioned to be privately designed, built, operated, maintained, funded, insured, and financed" and that "Metro does not envision taking a hands-on, prescriptive, or performance minded approach to this project, instead focusing on the

elements of the project for which Metro would be responsible." (Response to Metro Request for Information ["Response to Metro"], Sept. 26, 2018, p. 8.)[3] Thus, CEQA Guidelines section 15051 subdivision (a) does not apply.

Footnote 3: See also, Response to Metro, p. 16: "Unlike other Metro projects, the ART is a privately funded/financed, designed, built, operated, maintained, and insured transport conveyance to a private property that is open to the public. Like Dodger Stadium, the ART system will be open to the public for certain events and activities but not publicly owned. It is more akin to the Palm Springs Aerial Tram as a service provided for transportation to a specific location."

Response GO8-4 The cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. Nevertheless, Metro's statement does not suggest that Metro has absolved itself of oversight for the proposed Project as this comment and letter suggests. Metro recognizes that as the lead agency it is responsible for overseeing aspects of the proposed Project within its jurisdiction, and will exercise its independent judgment in consideration of the proposed Project, which as discussed in Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, is being proposed by Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects. Refer to Responses GO8-1 and GO8-2 for a discussion of how Metro is the appropriate lead agency for the proposed Project, consistent with its statutory authority under Public Utilities Code section 13052. As recognized by CEQA Guidelines section 15051(b), where the proposed Project would be "carried out by a nongovernmental person or entity," such as here, where the Project Sponsor would carry out the proposed Project, "the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole" or "will normally be the agency with general governmental powers." Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Further, Metro independently decided to act as the CEQA lead agency following the Unsolicited Proposal Process, consistent with CEQA Guidelines section 15051(b). In addition, under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).)

Comment GO8-5 Guidelines section 15051 subdivision (b), which does apply, strongly disfavors Metro as the lead agency because Metro does not have the "greatest responsibility for supervising or approving the project as a whole." First, in admitting that it will not take a hands-on, prescriptive approach to the Project, Metro has disavowed that it will supervise the Project's construction.[4] Second, Metro's role in approving the Project will be limited. It will focus only on the Project elements for which it is responsible. (Ibid.)

According to the DEIR, Metro's oversight is limited to three approvals:

- review and approval of Project plans for design, construction, and implementation;
- an easement or other approval to allow construction and operation of the Project within a portion of Los Angeles Union Station; and,
- an encroachment permit or other approval to allow construction and operation of the Project within Metro's Gold Line right-of-way. (DEIR, p. 2-61.)

The first of the above approvals that will purportedly be made by Metro is properly within the jurisdiction of Cal/OSHA's Amusement Ride & Tramway Division, not Metro. It appears the primary reason the Project proponent agreed that Metro could also review and approve its plans is because the proponent specifically requested and negotiated with Metro to serve as the lead agency, not because it believes Metro has primary authority over the design, construction, and implementation of the Project. To the contrary, as LA ART argues and LA Parks Alliance agrees, Metro clearly does not have this authority:

> In response to Metro's assertion that ART is subject to Metro approval under the requirements of the California Public Utilities Code ("CPUC), ARTT LLC agrees in general that such approval is appropriate since ARTT LLC has asked Metro to act as the Lead Agency for environmental clearance, together with assistance with the acquisition of surface land and/or aerial easements, as necessary, and the potential location of a passenger station at or near Los Angeles Union Station. We do ask Metro to recognize, however, that **aerial gondolas and tramways are regulated by the California Labor Code, Sections 7340-7357, and the detailed implementation of design, plans, and specifications falls under the jurisdiction of the Department of Industrial Relations, Division of Occupational Safety and Health ("Cal/OSHA"), which includes an Amusement Ride and Tramway Unit.**

(Response to Metro, p. 16 [emphasis added].)

Footnote 4: Nor does Metro have the authority to supervise the Project. See section D, infra, pp. 8-10.

Response GO8-5 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro has discretionary authority to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project (Public Utilities Code § 130252), which will include several discretionary approvals (multiple approvals of design and construction plans, approvals and agreements contemplated in the Memorandum of Agreement and subsequent amendments, agreement to integrate fares with Metro's fares / one tap system). This discretionary authority is considerably more broad than the individual land use and other review and approvals

to be issued by responsible agencies for the components of the proposed Project occurring within their jurisdiction. In short, Metro has "the greatest responsibility for supervising or approving the project as a whole" and is the appropriate lead agency. (CEQA Guidelines, §15051(b) [emphasis added].) Simply because other agencies have approval authority for the proposed Project, does not mean that Metro does not have the "principal responsibility" for approving or supervising the proposed Project. Indeed, CEQA recognizes that multiple agencies may have authority over a project. Therefore, CEQA includes the responsible agency process and consultation requirements in order for other agencies to provide necessary review and approval of aspects of a project. (Pub. Resources Code, §§ 21067, 21069.) The proposed Project would require review and approvals from Caltrans, State Parks, the City, and Cal/OSHA, as responsible agencies, in addition to review and approval by Metro as lead agency. Responsible agencies' discretionary approvals required for the proposed Project are secondary to Metro's statutory authority to review and approve transportation projects, and these other agencies were appropriately named as responsible agencies. Further, Metro engaged in required consultation with all responsible agencies during the process of preparing the Draft EIR for the proposed Project, in compliance with CEQA. The cited document predates the initiation of the CEQA review process for the proposed Project, and accordingly has no bearing on the sufficiency of the Draft EIR. No further response is warranted. Refer to Responses GO8-19 through GO8-22 for responses to comments raised in Section D to this letter.

Comment GO8-6 The DEIR acknowledges that approvals from Cal/OSHA's Amusement Ride & Tramway Division will be required pursuant to Cal. Code Regs. Tit. 8, §§ 3150-3191, including a Certificate of Construction. (DEIR, p. 2-61.) It does not, however, mention that California law requires all passenger tramways to receive a permit pursuant to Division 5 of the California Labor Code. The DEIR is therefore incomplete and inaccurate for failing to acknowledge this additional requirement.[5]

Footnote 5: California Labor Code, § 7341: "A passenger tramway shall not be operated in any place in this state unless a permit for the operation of the tramway is issued by the division, and unless the permit remains in effect and is kept posted conspicuously in the main operating terminal of the tramway."

Response GO8-6 As discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, "the Project EIR will provide environmental clearance as needed for all of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project, including, but not necessarily limited to . . . Pursuant to Title 8, California Code of Regulations sections 3150 through 3191, approvals from the Amusement Ride & Tramway Division [of Cal/OSHA], including a Certificate of Construction." Under Labor Code Section 7341, quoted by this commenter, "[a] passenger tramway shall not be operated in any place in this state unless a permit for the operation of the tramway is issued by the division, and unless the permit remains in effect and is kept posted conspicuously in the main operating terminal of the

tramway." 'Division' means the Division of Occupational Safety and Health. This is consistent with the approvals identified in the Draft EIR and is therefore not an additional requirement beyond what the Draft EIR identified.

Comment GO8-7 CEQA's mandatory process to determine the appropriate lead agency does not permit confidential negotiations between a project proponent and its preferred public agency for the role, a perverse sort of lead agency "forum shopping." (See Planning & Conservation League v. Department of Water Resources (2000) 83 Cal.App.4th 892, 906 ["PCL v. DWR"]: private party and local agency are "not at liberty to anoint" the local agency as lead agency through a private agreement.)

Response GO8-7 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Responses GO8-1 and GO8-2, for a discussion of how Metro is the appropriate lead agency for the proposed Project. Metro is the agency tasked with planning, operating, and coordinating funding for the region's transportation system, and is the appropriate lead agency for the proposed Project, which will become an integrated part of the regional transportation system. Further, this comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's process and sole source determination for the proposed Project.

Comment GO8-8 Moreover, compared to Metro's somewhat limited role with only two necessary approvals (both for use or encroachment upon Metro land), the anticipated role of the City of Los Angeles is far more extensive and complex. The DEIR identifies the necessary City approvals as likely including, but not limited to:

- a franchise agreement to operate "upon, over, under, or along any street, highway or other place in the City of Los Angeles";
- approval of the Project design from the Cultural Affairs Commission for components located within the City's public right-of-way;
- creation of a Specific Plan;
- adoption of a Sign District;
- a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit;
- relief from the River Implementation Overlay District, to allow for the construction of several project components (Alameda Station, Alameda Tower, and Alpine Tower);
- relief from Cornfield Arroyo Seco Specific Plan to allow construction and operation of the Chinatown/State Park Station;

- a Development Agreement between the "Project Sponsor" and the City of Los Angeles for 20 years; and,
- "Other discretionary and ministerial permits, approvals, consultations, and coordination will or may be required, including…temporary street closure permits, demolition permits, grading permits, excavation permits, archaeological permits, encroachment permits, building permits, dewatering permits, stormwater permits, noise variances, work hour variances, haul routes, sign permits, any operational agreements…and any applicable permits or clearances related to water and/or energy infrastructure or emergency access."

  (DEIR, pp. 2-61 to 62.)

The vast majority of these "other discretionary and ministerial permits" and other approvals referenced in the DEIR will be made by the City of Los Angeles, since the 1.2-mile- long Project is proposed to be built and operated predominantly on or above City right-of-way. (DEIR, pp. 2-2 and 2-6 [Figure 2-3].)

Response GO8-8 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO8-5 for a discussion of Metro's role as the lead agency and how Metro's discretionary authority is considerably more broad than individual land use and other review and approvals to be issued by responsible agencies for the components of the proposed Project occurring within their jurisdiction. Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from responsible agencies for the proposed Project. Refer to Response GO8-5 for discussion of Metro's consultation with responsible agencies, including the City.

Comment GO8-9 CEQA strongly prefers to confer lead agency status on an "agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." (CEQA Guidelines, § 15051(b)(1).) Metro is an agency with a single purpose, albeit a very important one. But it does not have general governmental powers as the City of Los Angeles does to, for example, grant relief from City land use regulations, create a specific plan, agree to a franchise agreement for Project use of public rights-of-way, enter into a 20-year Development Agreement, or offer any of the "other discretionary and ministerial permits" and approvals necessary for the Project to be ultimately approved.

Response GO8-9 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from responsible agencies for the proposed Project. Refer to Response GO8-5 for discussion of Metro's role as the lead agency, and how Metro's discretionary authority is considerably more broad than individual land use and other review and approvals to be issued by responsible agencies for the

components of the proposed Project occurring within their jurisdiction, the City's role as a responsible agency, and Metro's consultation with responsible agencies, including the City.

Comment GO8-10 As the DEIR admits, the City of Los Angeles has direct and exclusive authority over all streets in the City. (DEIR, p. 3.17-1: "All the streets in the Project study area are under the jurisdiction of the City of Los Angeles.") The required franchise agreement is key to the Project moving forward since the Project operates primarily within the City's public right-of-way. In addition, it is the City that is responsible to ensure the Project's consistency with the City's General Plan and its components, including numerous community plans and two existing specific plans, not Metro. (DEIR, pp. 3.11-8 to 3.11-13). Metro has no experience or expertise in evaluating the Project's consistency with the City's General Plan or crafting appropriate mitigation measures to address significant conflicts. The City clearly does.

Response GO8-10 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO8-5 for discussion of the City's role as a responsible agency and Metro's consultation with responsible agencies, including the City. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a consistency analysis of the proposed Project conducted with local plans and documents, including the City of Los Angeles General Plan, including the Community Plans, Alameda District Specific Plan, Cornfield Arroyo Seco Specific Plan, City of Los Angeles Municipal Code and RIO District Ordinance. As discussed in Section 1.0, Introduction, of the Draft EIR, the City of Los Angeles is a responsible agency under CEQA for the Draft EIR and, as discussed in Section 8.0, List of Preparers, of the Draft EIR, was consulted during the preparation of the Draft EIR, including on Section 3.11, Land Use and Planning.

Comment GO8-11 The City is also entirely responsible for any changes to and conditions associated with the 1960 Dodger Stadium Conditional Use Permit, and for relief from other City land use regulations in the Project area. The City is also responsible for required "temporary street closure permits, demolition permits, grading permits, excavation permits," etc. (DEIR, p. 2-62.) Metro has no experience, expertise, or authority for a private project over these fundamental City concerns.

Response GO8-11 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO8-5 for discussion of the City's role as a responsible agency and Metro's consultation with responsible agencies, including the City. Under CEQA, the EIR provides the necessary environmental clearance for the whole of the project, including subsequent actions by responsible agencies. A responsible agency participates in the EIR preparation process through consultation and review of the Draft EIR. As a decision-maker, the responsible agency will consider the project's environmental impacts as described in the EIR prepared by the lead agency, and then decide whether to approve the action before it. (CEQA Guidelines, § 15096(a).) Accordingly, should Metro approve the proposed Project and certify the EIR, the City would then rely on the EIR in considering the aspects of the proposed Project within

its jurisdiction. Refer to Section 2.10, Required Permits and Approvals, and Section 3.11, Land Use, of the Draft EIR, noting that, pursuant to Los Angeles Municipal Code ("LAMC") Section 12.24.M, the Project Sponsor may seek a Plan Approval for the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow Stadium Tower and Dodger Stadium Station to implement the proposed Project. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events." Refer to pages 3.11-17 through 3.11-18, of Section 3.11, Land Use, of the Draft EIR, for a discussion of the CUP's requirements, including that "'automobile parking facilities for a minimum of one (1) automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on site, so a total of 15,556 parking spaces must be provided and maintained on site. There are currently a total of 18,889 parking spaces provided and maintained on site." An analysis of the proposed Project's consistency with the CUP and the CUP's requirements (including how a total of 18,889 parking spaces are currently provided on the site, and a total of 15,556 are required to be provided under the CUP) is provided on page 3.11-43. As discussed in Section 1.0, Introduction, of the Draft EIR, the City of Los Angeles is a responsible agency under CEQA for the Draft EIR, and as discussed in Section 8.0, List of Preparers, of the Draft EIR, was consulted during the preparation of the Draft EIR, including on Section 3.11, Land Use and Planning.

Comment GO8-12 Metro does not have the desire (recalling that it has already disavowed Project oversight) or the necessary incentive or expertise to enforce the many Mitigation Measures associated with the Project for components not located on Metro property.[6] This may be one reason Metro has allowed so many of the Project's proposed Mitigation Measures to be improperly deferred, a subject that will be raised in greater detail in LA Parks Alliance's (and likely other) comment letters regarding the inadequate DEIR.

Footnote 6: These include: Construction Traffic Management Plan [DEIR, p. ES-14], Construction Monitoring Plan (Built Resources) [DEIR, p. ES-40], Cultural Resources Monitoring and Mitigation Plan (DEIR, p. ES- 41], Archeological Testing Plan for Alameda Station (DEIR, p. ES-45], Archaeological Testing Plan for LAUS Forecourt [DEIR, p. ES-47], Archaeological Testing Plan for Los Angeles State Historic Park [DEIR, p. ES-48], Paleontological Resources Mitigation and Monitoring Plan [DEIR p. ES-52], Soil and Groundwater Management Plan [DEIR, p. ES-53], Construction Noise Management Plan [DEIR, p. ES- 58, Vibration Monitoring Plan [DEIR, p. ES-67, Temporary Disaster Route Plan [DEIR, p. ES-76], Utility Relocation Plan [DEIR, p. ES-79], and a Fire Protection Plan [DEIR, p. ES-80].

Response GO8-12 Contrary to this comment's assertion, Metro has not "disavowed" oversight of the proposed Project. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and to Table 7-1, Mitigation Monitoring and Reporting Program, of the Final EIR, for

the full Mitigation Monitoring and Reporting Program for the proposed Project. The Mitigation Monitoring and Reporting Program for the proposed Project designates which agencies, including Metro, are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures, nor could it. Refer to Response GO8-5 for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority and how the proposed Project would require review and approvals from Caltrans, State Parks, the City, and Cal/OSHA, as responsible agencies, in addition to review and approval by Metro as lead agency. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation.

Comment GO8-13 Indeed, the DEIR appears to assume that ARTT will prepare all these deferred mitigation plans, not Metro. (See, e.g., DEIR 3.13-68 [Construction Noise Management Plan to be prepared by "Project Sponsor."] Presumably, it is the City, with its direct construction permitting responsibilities, local ordinances regulating such impacts as excessive construction noise, and expertise in overseeing such plans and mitigation measures, that will perform the required oversight and, if necessary, enforcement. (See, e.g, DEIR's reliance on LA Municipal Code [i.e., the City] to enforce stormwater runoff prohibitions, pp. 3.10-6.).

Response GO8-13 Refer to Response GO8-12, for a discussion of how agencies will retain enforcement authority over mitigation for the proposed Project. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures.

Comment GO8-14 The City of Los Angeles has direct regulatory authority over approval of the majority of physical Project components, which are primarily located on or above City land or City public right of way. The City is plainly the "public agency with the greatest responsibility for supervising or approving the project as a whole" and has the "general governmental powers" necessary to make most necessary Project approvals. (CEQA Guidelines, § 15051(b).) Metro has neither the greatest responsibility over the Project nor does it have general governmental powers to make Project approvals. Its approvals are limited to only two locations: one for permission to use Metro-controlled land, and another to cross Metro-controlled airspace.

The City of Los Angeles must be the lead agency.

Response GO8-14 Refer to Responses GO8-1 through GO8-13 for a discussion of how Metro is the appropriate lead agency for the proposed Project, and the City's role as a responsible agency for the proposed Project.

Comment GO8-15 B. CEQA Guidelines Section 15051 Subdivisions (c) and (d) are Inapplicable

CEQA Guidelines section 15051 subdivision (c) only applies "[w]here more than one public agency equally meet the criteria in subdivision (b)." It is inapplicable, as the City of Los Angeles is clearly the appropriate lead agency under subdivision (b). Even if subdivision (c) did apply, and it does not, between Metro and the City of Los Angeles it is the City that would likely "act first on the project in question" due to the many preliminary approvals necessary for a project of this scope and magnitude. (See list of City approvals required for the Project, DEIR, p. 2-61 to 2-62, and discussion supra, pp. 4-6.)[7]

Footnote 7: In fact, the City of Los Angeles already approved a Project-related permit when it issued Permit No. 22020-10000-00312 for ARTT LLC's gondola exhibit within the Dodger Stadium parking lot. /www.ladbsservices2.lacity.org/OnlineServices/PermitReport/PcisPermitDetail?id1=22020&id2=1 0000&id3=00312.

Response GO8-15 This comment takes into consideration the link provided in Footnote 7. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project requires approvals from the City. Refer to Response GO8-5 for further discussion of discretionary approvals required for the proposed Project, including from responsible agencies. CEQA does not require a lead agency to have jurisdiction over all areas where a proposed Project may result in environmental impacts. (Pub. Resources Code, § 21067; CEQA Guidelines, § 15367.) The Draft EIR properly considered all potential impacts in the area of the proposed Project, which includes property that is in the jurisdiction of Metro, the City, State Parks, and Caltrans. Metro consulted with all responsible agencies, including the City, regarding potential impacts to their property, in compliance with CEQA. And, under the Mitigation, Monitoring and Reporting Program for the proposed Project, included in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, the City would have certain enforcement authority to ensure mitigation of any potentially significant impacts that would occur on City-owned property and ROW. The fact that the City issued a ministerial permit for a gondola cabin exhibit display at the Dodger Stadium property is not evidence that the City is the appropriate lead agency for the aerial gondola system—a transportation project. As discussed in Response GO8-2, Metro is the

proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment GO8-16 While the project proponent agreed in a private negotiation that Metro may also review and approve Project plans for design, construction, and implementation, as ARTT privately admitted to Metro during early discussions about the Project, the statutory duty to review and approve plans for design, construction, and implementation of an aerial tram system properly belongs to Cal/OSHA pursuant to the California Labor Code, not to Metro. (Response to Metro, p. 16, citing Labor Code, §§ 7340-7357.) Moreover, nothing in the Labor Code or other statute requires it to be the first action taken on the Project.

Response GO8-16 Refer to Response GO8-5 for discussion of how the proposed Project would require review and approvals from Caltrans, State Parks, the City, and Cal/OSHA, as responsible agencies, in addition to review and approval by Metro as lead agency, and responsible agencies' discretionary approvals required for the proposed Project are secondary to Metro's statutory authority to review and approve transportation projects, and these other agencies were appropriately named as responsible agencies. In addition, the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. This comment also mischaracterizes the cited document, which requested that the Project Sponsor list potentially applicable statutes and regulations.

Section 2.0, Project Description, of the Draft EIR, sets forth potential approvals from responsible agencies such as the City, Caltrans, State Parks, and Cal/OSHA, and approvals from Metro, which will involve additional opportunities for public hearing and comment on the proposed Project. For example, Metro's discretionary authority under Section 130252 to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project involves several potentially discretionary approvals, including, for example, approvals of design and construction plans, approvals and agreements contemplated in the Memorandum of Agreement and subsequent amendments, and agreement to integrate fares with Metro's fares / one tap system. The proposed Project would comply with applicable standards, requirements, building codes, and guidelines as determined by the City of Los Angeles, Metro, and/or Cal/OSHA or the appropriate agencies/regulatory authorities during the permitting process for the proposed Project.

This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate). The appeal in this lawsuit was abandoned on May 26, 2023, and accordingly the Los Angeles Superior Court's decision is final.

Metro followed the prescribed process for unsolicited proposals to the Metro Office of Extraordinary Innovation ("OEI"), which involved several public meetings where the proposed Project was discussed in an open forum and otherwise made public on Metro's website. On April 25, 2018, the Project Sponsor submitted its Unsolicited Proposal to OEI. At the April 26, 2018, Metro Board of Directors meeting, the then-Metro CEO and Chair spoke about the proposed Project during their respective reports. Metro issued a press release on this date, noting that Metro had received the proposal and would evaluate the proposal under its Phase I analysis process "within 60 days of being received" in accordance with the Unsolicited Proposal policy process, prior to then choosing whether or not to advance the proposal to the more-detailed Phase II consideration. ("Metro receives Unsolicited Proposal for aerial rapid transit between Union Station and Dodger Stadium," Metro – The Source (April 26, 2018).)[1]

Following its consideration of the proposal consistent with the OEI process, Metro sent a letter to the Project Sponsor on October 11, 2018, confirming that the proposed Project would proceed to a sole source agreement, noting that Metro was prepared to enter into exclusive negotiations on the proposed Project. Metro's December 3, 2018 Board Box included a discussion of the OEI process, noting that the Project Sponsor met the sole source criteria and, that during the Phase I review, Metro "felt that this zero-emission mode could provide a useful, creative and fun means of accessing Dodger Stadium and Elysian Park while reducing congestion and improving air quality in the neighborhoods surrounding the Stadium" and "conducted due diligence on the feasibility of this unique partnership and assessed the costs and benefits to Metro and the public of partnering on the project."[2]

At the December 6, 2018, Metro Board of Directors meeting, the then-Metro CEO and Chair provided the Metro Board with an update on the proposed Project in his CEO Report to the Board, noting that he had "signed a memo closing out the unsolicited proposal process for the Los Angeles Aerial Rapid Transit Project and advancing that project to the implementation phase" and that Metro would "continue to develop the project by entering into an exclusive negotiation with our partner, the Aerial Rapid Transit Technologies LLC."[3] On this same day, Metro issued a press release announcing that Metro and LA ART had signed a letter of intent to "formally begin the negotiations necessary" for the proposed Project and that the letter of intent "signals Metro's interest in implementing the project and moves it from the Unsolicited Proposals evaluation stage to project development."[4] Metro formally concluded the Unsolicited Proposal process on December 14, 2018, determining that

[1] Hymon, Steve. 2018. Metro receives Unsolicited Proposal for aerial rapid transit between Union Station and Dodger Stadium. Available at: https://thesource.metro.net/2018/04/26/metro-receives-unsolicited-proposal-for-aerial-rapid-transit-between-union-station-and-dodger-stadium/. Accessed August 2023

[2] Los Angeles County Metropolitan Transportation Authority (LA Metro). December 3, 2018 Board Box Update.

[3] Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - December 6, 2018 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/987?view_id=2&redirect=true&h=7b1d4fe0fe92c06e7a30b6c30ed61f65. Accessed September 2023.

[4] Hymon, Steve. 2018. Metro and ARTT co-sign Letter of Intent to begin negotiations on developing gondola to Dodger Stadium. Available at: https://thesource.metro.net/2018/12/06/metro-and-artt-co-sign-letter-of-intent-to-begin-negotiations-on-developing-gondola-to-dodger-stadium/#:~:text=Metro%20announced%20on%20Thursday%20that,to%20Dodgers%20Stadium%20a%20reality. Accessed August 2023.

the proposal satisfied the Phase II criteria, and advanced the proposal to the implementation process.

Contrary to this comment's suggestion that Metro's OEI process occurred "privately," as stated above, the then-Metro CEO and Chair provided the Metro Board with an update on the proposed Project on December 6, 2018 at the public Board of Directors meeting, noting that Metro was "entering into an exclusive negotiation" with LA ART. Metro's December 3, 2018 Board Box included a discussion of the OEI process, noting that "after reviewing the Phase II proposal submitted," the Metro "review team recommended moving forward to implementation by entering into exclusive negotiations." Metro's Unsolicited Proposal Policy FAQs recognizes that "Metro Board meetings are matters of public record,"[5] and this extends to items provided within Metro's Board Box. In addition, at the publicly-noticed April 18, 2019 Metro Executive Management Committee ("EMC") meeting and the April 25, 2019 Metro Board meeting, Metro received and filed a status report on the proposed Project that outlined the steps for moving forward with the proposed Project, including continuing negotiations on the Memorandum of Agreement ("MOA") between the Project Sponsor and Metro, and the CEQA process. The reports for these meetings outlined the MOA's terms, including that Metro will act as lead agency for the proposed Project under CEQA. The reports also affirmatively acknowledge Metro's sole source determination, stating that in 2018, "Metro formally concluded the unsolicited proposal process and began exclusive negotiations with ARTT."

The proposed Project was also discussed at publicly-noticed Metro EMC and Board meetings on September 17, 2020, September 24, 2020, June 17, 2021, and June 24, 2021.

Metro's consideration of the proposed Project did not occur solely behind closed doors.

Comment GO8-17 CEQA Guidelines section 15051 subdivision (d) is also inapplicable. It applies "[w]here the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the lead agency." As discussed, here Metro does not have a substantial claim to be the lead agency because it cannot be seen as "the public agency with the greatest responsibility for supervising or approving the project as a whole," and CEQA strongly prefers the lead agency to have "general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." (CEQA Guidelines, § 15051(b).) Metro has taken on the role by private agreement with the Project proponent and with the apparent acquiescence of the City, whose former Mayor championed the Project in his role as chair of

[5] Los Angeles County Metropolitan Transportation Authority (LA Metro). Unsolicited Proposal Policy FAQS. Available at: https://uc17dec76f6ff009d08b76dae4be.dl.dropboxusercontent.com/cd/0/inline2/CFZWXUnLWHIFFjN-qROvNU3jzqvBjzXBeXioSlapFscbSh4sS3yTE5K6B9cI9QsU4_mfjyNaIHgc7tJB0s7hCgzFWOJ6JsyvUFIsc7wh3qo90zontBx4OUGFSW-i7itNfjciBwWtZWBuezBb2MQ38T5vW4-ikfEjIhHekMHqQEOjFCsTVFGlcwIQ45pmHwyydyFy5_m03V43XzyTyDFfCltqB-c_-XJyccuYmLwG6Jy9xuQEn_lzzn8sdJlDqIbyFOwHu8usBh2MSLWfDjk679sg3tFQJhJXgTtQ2bYnfdGz1fYJJwqXozn2gRq6_0vP7E0ZWI0Sl_SYqk6vUVo88vz6AagBWicVJcbJ5ImaZuo1vWm0U6aXVAOhZJsoitE8ooY/file. Accessed September 2023.

Metro's board of directors. Indeed, Mayor Garcetti described himself openly in a recent Metro Executive Management Committee meeting as a "pretty unabashed supporter" of the Project, which raises significant concerns over Metro's possible precommitment to approve the Project.[8]

Footnote 8: See Joe Linton, StreetsBlogLA, Mayor Garcetti Supports Dodgers Gondola, Disses Project Skeptics Comparing Them To Mitch McConnell, Sept. 16, 2022, attached as Exhibit A, available at: https://la.streetsblog.org/2022/09/16/mayor-garcetti-supports-dodgers-gondola-disses-project-skeptics- comparing-them-to-mitch-mcconnell/.

Response GO8-17 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Responses GO8-5 and GO8-9 for discussion of how Metro is the appropriate lead agency for the proposed Project. Refer to Response GO8-16 for a discussion of how Metro complied with its own process before agreeing to act as lead agency for the proposed Project. As CEQA requires, Metro prepared the Draft EIR for the proposed Project in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. (See CEQA Guidelines § 15121(a).) Metro will consider whether to certify the EIR and approve the proposed Project at a public hearing in the future. Metro has not pre-committed to the proposed Project. Statements from Metro's former Chair indicating that Metro should advance consideration of a zero-emission transit project do not amount to an action that advances the proposed Project in a manner that foreclosed alternatives or mitigation measures. Lead agencies may engage in preliminary activities designed to facilitate or otherwise encourage a project without entering into a binding commitment or approval. No such commitment has occurred.

Comment GO8-18 C. Metro's Decision to Act as Lead Agency is Inherently Prejudicial and Taints the Environmental Review Process

Choice of lead agency is fundamentally important. "[A]lthough applicants may enter into contracts and agreements prior to the completion of the environmental review process, such contracts or agreements cannot be used to avoid the scrutiny envisioned by CEQA." (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 737 [emphasis added].) Thus, where a local agency privately agrees with an applicant to serve as lead agency, or even where local agencies agree amongst themselves to designate one of them as lead agency, if that designation does not follow CEQA's mandated process, it will be rejected and the environmental review document prepared by the improper lead agency discarded. (See, e.g., PCL v. DWR, 83 Cal.App.4th at 907; see also City of Sacramento v. State Water Resources Control Bd. (1992) 2 Cal.App.4th 960, 973.)

Metro (and the City of Los Angeles) should take note that CEQA forbids delegation by the properly delegated lead agency to another agency or private entity:

> Neither the [California Environmental Quality Act] nor the state guidelines authorize the city council to delegate its review and consideration function to another body. Delegation is inconsistent with the purpose of the review and consideration function since it insulates the members of the council from public awareness and possible reaction to the individual members' environmental and economic values. Delegation is inconsistent with the purposes of the EIR itself."

(PCL v. DWR, 83 Cal.App.4th at 907, quoting Kleist v. City of Glendale (1976) 56 Cal. App. 3d 770, 779.) As plaintiffs successfully argued in PCL v. DWR, "appointment of the wrong lead agency taints the entire EIR process, is inherently prejudicial, and compels a fresh start with an appropriate lead agency." (Ibid.)

Metro's decision through a private agreement with ARTT LLC to take on lead agency status in the environmental review of the proposed aerial tram system is likewise prejudicial and taints the environmental review process. The only remedy is to begin anew under the direction of the properly designated lead agency, the City of Los Angeles.

Response GO8-18 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO8-5 for a discussion of how Metro is the appropriate lead agency for the proposed Project, and to Response GO8-7, for a discussion of how Metro is the appropriate lead agency, including under the principles outlined in *Planning and Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892. Metro's receipt of funding to reimburse Metro for its efforts related to the Project from the Project Sponsor for the proposed Project does not negate Metro's authority as lead agency; it is commonplace for a project sponsor to reimburse a lead agency's efforts related to a project. Furthermore, the MOA provides that it does not constitute or evidence an approval by Metro of, or commitment of Metro to, any action for which prior environmental review is required under CEQA. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's process and sole source determination for the proposed Project. The appeal in this lawsuit was abandoned on May 26, 2023, and accordingly the Los Angeles Superior Court's decision is final. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO8-19 D. Public Utilities Code Section 130252 Does Not Change the CEQA Analysis and Neither Requires Nor Authorizes Metro to Serve as Lead Agency

The Draft EIR suggests that Public Utilities Code ("PUC") section 130252 requires the submittal, review, and approval of proposed plans to Metro for design, construction, and implementation of the Project. (DEIR, p. 2-61.) As discussed above, ARTT LLC explained to Metro that "aerial gondolas and tramways are regulated by the

California Labor Code, Sections 7340-7357, and the detailed implementation of design, plans, and specifications falls under the jurisdiction of the Department of Industrial Relations, Division of Occupational Safety and Health ("Cal/OSHA")." (Response to Metro, p. 16.)

PUC section 130252 applies only to "public mass transit systems or projects, including exclusive public mass transit guideway systems or projects, and federal-aid and state highway projects." (PUC § 130252(a) (emphasis added).) This project is not a public mass transit project or a mass transit guideway system.[9] The Project is privately owned and operated and intended primarily to provide service to and from Dodger Stadium, a private sports and event venue. The DEIR admits as much: "The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property…" (DEIR, p. 2-12.)

Footnote 9: ARTT LLC explained, and LA Parks Alliance agrees, that the gondola Project is "not a 'transit guideway system'" and thus is not subject to PUC section 130252(a) for that reason. (Response to Metro, pp. 16-17.)

Response GO8-19 The cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. This comment also mischaracterizes the cited document, which requested that the Project Sponsor list potentially applicable statutes and regulations. Refer to Response GO8-16 for a discussion of how Metro complied with its own process before agreeing to act as lead agency for the proposed Project. Refer to Response GO8-2 for discussion of Metro's statutory authority under Public Resources Code section 130252. As discussed in Topical Response A, SB 44, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Thus, Metro is legally authorized under state law to approve the proposed Project. For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project.

Comment GO8-20 The DEIR's repeated assertions that Project purposes include providing access to neighborhoods near Dodger Stadium and to LA State Historic Park and its surrounding neighborhoods (see, e.g., DEIR, p. ES-1) are also belied by the DEIR's gross speculation surrounding these alleged purposes. For example, the alleged access and mobility hub at Dodger Stadium is identified only as a "potential" project component and would be subject to approval by the Dodgers. (DEIR, pp. ES-1.) "The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger

Stadium Station to include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon." (DEIR, p. ES-10 [emphasis added].)

Response GO8-20 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment GO8-21 The DEIR asserts that the "Chinatown/State Park Station location avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway." (DEIR, p. 222.) First, access from Union Station to these neighborhoods are already provided by Metro's Gold Line Chinatown Station, which is located approximately 100 yards from the Project's proposed Chinatown/State Park Station. Second, and perhaps more important, the use of the Project to duplicate this access via the proposed gondola outside of Dodger games and events is entirely speculative, and is based entirely on demand. "It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand." (DEIR, p. 2-42.) Nothing in the DEIR suggests the gondola will operate on a

minimum schedule, as Metro's Gold Line does.[10] ARTT LLC or another operator could choose not to run the gondola at all if demand is insufficient.

Footnote 10: Metro's Gold Line schedule provides weekday service on its Northbound segment from Union Station to Citrus College every 12 minutes or less for most of the day between 4am and 12:50am. The weekend schedule is the same hours, with only slightly less frequent service. See https://www.metro.net/riding/schedules/?line=804.

Response GO8-21 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would enhance public transit options for the park by providing passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex, pedestrian access enhancements which could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Accordingly, and as discussed in Section 3.11, Land Use and Planning, the proposed Project would provide an additional transit option that links to the existing LAUS, helping to build the resilience of the regional transportation system and increasing connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property. Implementation of the proposed Project would create new and improve existing transit connections not only to communities along the proposed Project alignment, but to other transit lines and stations, including the regional transit lines served by LAUS, the Chinatown Metro L Line (Gold) station, and several regional and local bus lines serving the Project Study Area. Further, compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO8-22 Even if these currently speculative components were certain to become part of the Project, they would not magically transform it into a public mass transit system. A project owned and operated by a private person or entity for the primary purpose of providing transportation to an entirely private destination is not a public mass transit

system. As a private transportation project, and as ARTT LLC admitted in its responses to Metro, the Project is not within the scope of PUC section 130252. And even if PUC section 130252 did apply, it has very limited scope.

PUC section 130252 subdivision (a) provides that:

> All plans proposed for the design, construction, and implementation of public mass transit systems or projects, including exclusive public mass transit guideway systems or projects, and federal-aid and state highway projects, shall be submitted to the commission [i.e., Metro] for approval.

But PUC section 130252 subdivision (c) substantially limits the meaning of subdivision (a): "As used in this section, "plan" means a project description and not the detailed project plans, specifications, and estimates." (Emphasis added.) The Project applicant has privately agreed with Metro that it may also review and approve Project plans for design, construction, and implementation. (See Response to Metro, p. 16.) As already discussed, however, the primary oversight authority for detailed review of plans for design, construction, and implementation of an aerial tramway project is held by Cal/OSHA, not Metro. Moreover, the DEIR does not cite to any authority authorizing or permitting Metro to supervise the Project.

Metro's and the DEIR's citation of PUC section 130252 does not change the mandated CEQA process to determine the appropriate lead agency for the proposed Project.

Response GO8-22 This comment provides a general recitation and characterization of statutes and regulations and a general summary of comments raised in this letter. Responses to the comments raised in this letter are provided above in Responses GO8-1 through GO8-21. In addition, the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. Under CEQA, in preparing the EIR, the lead agency must assume that the proposed project would be built in order to analyze the potential environmental impacts of the project. Accordingly, the components of the proposed Project are not "speculative" for the purposes of Metro's environmental analysis, as this comment suggests.

Comment GO8-23 CONCLUSION

As the DEIR acknowledges, "a lead agency has an obligation to balance the economic, social, technological, legal, and other benefits of a project against its significant unavoidable impacts on the environment." (DEIR, p. 1-2.) Metro certainly has authority as a responsible agency to consider the manner the proposed Project will relate to the important public resources over which it exercises control and oversight. But Metro is not well-situated to be the lead agency charged with the duty to make these balancing considerations over the many public resources that are not within its ambit.

Metro approvals for this Project will be required to allow construction and operation of the Project within a portion of Los Angeles Union Station and within Metro's Gold Line right-of-way. (DEIR, p. 2-61.) It is significant that the DEIR has determined no Mitigation Measures are necessary to protect these public resources. But there are numerous Mitigation Measures proposed to protect other public resources and members of the public in the City of Los Angeles. (See footnote 5, p. 6.) The City is far better situated to act as lead agency than Metro, and since it is directly political accountable to its constituents, is better positioned to balance the alleged Project benefits against its significant unavoidable environmental impacts and ensure that Mitigation Measures to protect the people and resources of Los Angeles are properly monitored and enforced.

The City of Los Angeles must serve as lead agency for the proposed Project, not Metro.

Sincerely,

John Given

Cc (by email only):

Supervisor Hilda L. Solis, LA Board of Supervisors (First District)
Mayor Karen Bass, City of Los Angeles
Councilmember Eunisses Hernandez, LA City Council (District 1)
City Attorney Hydee Feldstein Soto, City of Los Angeles

Response GO8-23 This comment provides a general conclusion regarding the comments raised in this letter. Responses to all comments contained in this letter are provided above in Responses GO8-1 through GO8-22.

Comment Letter GO9 – Los Angeles Union Station Historical Society, Thomas R. Savio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO9

Comment GO9-1 Dear Mr. Zelmer,

The Board of Directors (The Board) of Los Angeles Union Station Historical Society (LAUSHS), a non-profit, Federal Railroad Administration Section 106 historic preservation consultant for Los Angeles Union Station (Union Station), a world recognized National Historic Landmark owned by Los Angeles County Metropolitan Transportation Authority (Metro), has voted to formally comment against Los Angeles Aerial Rapid Transit's (LAART) private, for-profit cable car line (aka "Frank McCourt's Gondola") and its public land and air rights development scheme that proposes to link Union Station and Metro's related "Esplanade-Forecourt" project with Dodger Stadium that The Board believes is contrary to Metro's public participation policy and an illegal (pending a Superior Court decision) "accommodation" for LAART. The Board believes that LAART's proposed futuristic/Carnaval-like Union Station Terminal on Alameda Street and Metro's supporting "Esplanade-Forecourt" project will blight the viewscape of the historic and architecturally significant west façade of Union Station, and that Union Station, its trains and patrons could be physically harmed if aircraft from the nearby Los Angeles Police Department's "Hooper Memorial Heliport" airport were to be entangled in LAART's overhead cables, gondolas and 13-story towers. Furthermore, The Board opposes Metro's planned removal of all "Disabled Parking" spaces from the "Esplanade-Forecourt" area, without public hearings and reasonable alternatives, to accommodate a new so-called "water feature" (a fogging-type water fountain) which would cool LAART patrons cued-up for their cable car rides to Dodger Stadium. Moreover, the water feature would be contrary to the state's water conservation policy. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

Until now, The Board has steadfastly refused to take sides in the above major, billionaire development scheme. However, in The Board's opinion, Metro and its staff have obviously taken a pro-active role supporting LAART, a potential competitor of Metro's efficient "Dodger Stadium Express" bus service, as well as planning to "gild the lily" of Union Station with its Esplanade-Forecourt Project, all "backstage," using public land, resources and airspace but without public participation as required by Metro policy and the law, before METRO agreed to be "engaged" by LAART.

Among the reasons for The Board's opposition are, but not limited to:

Response GO9-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. This comment provides

a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO9-2 through GO9-8.

Comment GO9-2 A) Metro Board member, the former Mayor of Los Angeles Eric Garcetti, who originally introduced the motion for Metro to assist LAART without public participation and to enlist Metro staff to "carry LAART's water" as it were, did receive, according to public records, millions of dollars in both "behest payments" and political cash contributions from Billionaire real estate and LAART developer Frank McCourt and/or his family and various entities and associates, which in The Board's opinion, is an apparent conflict of interest. Consequently, Metro is being sued by the non-profit California Endowment for willfully preventing public participation in Metro's decision to partner with LAART. (Ironically, Metro is using public resources to defend itself, for not allowing public participation, before the Superior Court.)

Response GO9-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. This comment also raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment GO9-3 B) In The Board's opinion, Metro Deputy Executive Officer Cory Zelmer and/or subordinates and consultants falsified an official environmental document--LAART's Draft Environmental Impact Report (DEIR)--by checking-off the DEIR box that states there is no airport within 2 miles [3520 yards] of LAART's proposed Union Station

Terminal, when he had been informed repeatedly to the contrary by The Board. Moreover, The Board presented proof to Zelmer and his superior, Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport" (variously described as the country's or the world's busiest airport for rotary-winged aircraft aka helicopters) is only 1/2 mile (880 yards) from LAART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer and Wiggins that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports officially defined as a location where any flying machine is serviced. The fact that some airports serve only rotary-winged aircraft (helicopters) while others serve fixed-wing aircraft (conventional-winged aircraft) does not change the fact that: all heliports are airports in the eyes of all governing agencies and the Federal Courts. Furthermore, the argument presented by Metro that Hooper Memorial is a police facility, not a civilian facility, and therefore not subject to the LAART DEIR, is illogical and fallacious. A helicopter that becomes entangled in LAART's cables, gondolas and 13-story towers and consequently crashes into Union Station, and/or its trains and patrons, could cause catastrophic harm regardless had that aircraft launched from a police facility or a public facility. Simply put, LAART's proposed location is not safe for the Union Station community and helicopters from Hooper Memorial Heliport airport. Please note, the Rules and Regulations of Los Angeles Union Passenger Terminal (Union Station's original name) has for decades declared: "General Notice A. Safety is of the first importance in the discharge of duty." Or did Metro abolish this paramount railroad safety rule when it bought Union Station?

Response GO9-3 The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus,

comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, and concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment GO9-4 C) Contrary to the promises made to The Board by Stephanie Wiggins, Cory Zelmer and LAART, no meeting has ever been organized between them and The Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LAART's Union Station Terminal. In fact Metro forbade The Board's examination of the only known 3-D scale model of Union Station's location because, in The Board's opinion, of a deliberate subterfuge that the model dating from former Union Station owner--the Santa Fe Railway--was too old to be accurate today, and furthermore the sharing of the model with The Board would somehow be a "conflict of interest"(?) even though The Board previously had access to the model. However, The Board's use of the model did not depend on the model's age, but only the juxtaposition of Union Station with Alameda Street which has not changed appreciably since the station was opened in 1939. Consequently, at a loss for options, The Board asked LAART to produce a 3-D scale model given its apparent resources, but LAART never responded. This "shadow play," in The Board's opinion, was being performed by LA Metro and LAART to obfuscate the issues and delay public criticism of LAART contrary to the public weal which Metro is obliged to serve. Furthermore, since the model is public property, The Board's use should have been permitted so it could be compared to LAART's distorted artist's rendering of its Futuristic/Carnaval style Alameda Street Terminal with Union Station's Hispanic-Cathedral style. Finally, after wasting The Board's time and resources for over a year, in December 2022 Metro provided to the public an aerial diagram of LAART's Alameda Terminal that is in the worst possible viewscape location--directly in front of Union Station! Cable car rides have their place but not in front of Los Angeles' world famous "Cathedral of Transportation."

Response GO9-4 Refer to Response GO9-3 for a detailed discussion of Hooper Heliport. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which

would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment GO9-5 D) In The Board's opinion, LAART is designed to compete with Metro's "Dodger Stadium Express," a highly efficient road service that could be further improved if Metro switched to modern, environmentally friendly motor coaches that might funded by the savings from not building its Esplanade-Forecourt project.

Response GO9-5 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction,

Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. While some riders of the Dodger Stadium Express are likely motivated by traveling in more sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles traveled (VMT) to Dodger Stadium than the proposed Project, which would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Comment GO9-6 E) Given the seasonal nature of baseball, it is also The Board's opinion that LAART is a "Trojan Horse" scheme to facilitate year-around, for-profit real estate development in Dodger Stadium's vicinity at the expense of public land and airspace, the viewscape of Union Station and safety.

Response GO9-6 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO9-7 F) Metro's proposed Esplanade-Forecourt project, according to Metro employees--who wish to remain anonymous for the sake of their careers--will be funded by so-called "overlap money" that was "peeled-off" from Metro's defunct LINK-US project that itself was rejected because of The Board's and the public's opposition. Moreover, Metro has stated to The Board's Executive Director via telephone that ultimately the Esplanade-Forecourt project will come to fruition by a two-step process eliminating

all public parking including “disabled parking” from in front of Union Station without public comment or participation in violation of the Americans with Disabilities Act (ADA). (A disabled motorist has already filed a formal complaint with the ADA authorities against Metro’s Esplanade-Forecourt project.) Step one would be the “temporary” elimination of all Union Station west front parking for the construction vehicles needed to build the Esplanade-Forecourt project followed by step two—well there really isn’t a step two—when the project is completed the parking spaces would be left permanently removed. Not only will this negatively impact the “disabled Parking” but also the parking for Metro’s tenants the Homebound Restaurant and Brewery, TRAXX restaurant and the numerous social and artistic events that take place in the great “Ticketing Hall” which has fallen from use with computerized ticketing. Furthermore, according to a retired Metro staff person, the Esplanade’s so-called “water feature” (a fogging-type water fountain) will likely attract more "homeless" citizens seeking “showers” contrary to Metro's stated policy--according to former Metro Union Station supervisor the late Ken Pratt--of not catering to the needs of the "homeless." In The Board’s opinion, Metro’s Esplanade-Forecourt project is designed to cool future LAART and adjacent Olvera Street tourist attraction visitors as they saunter between Union Station, LAART and Olvera Street. (While Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street tourist attraction” per se was invented in 1930 by a husband-and-wife real estate development team who went on to develop Los Angeles' “New Chinatown tourist attraction.” (Ironically, Old Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled after building the railroad to Los Angeles, then Union Station was built on top of Old Chinatown's rubble.)

Response GO9-7 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro’s LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment GO9-8 G) Finally, building the Esplanade-Forecourt project’s water-feature in semi-desert Los Angeles has been experiencing one of its worst multi-year droughts in history flies in the face of the State of California's policy to conserve dwindling water resources. One only needs to recall the classic Los Angeles-based movie “Chinatown” to understand what The Board believes is driving LAART and Esplanade-Forecourt schemes— the greed of land developers, the greed of Metro careerists and ultimately the greed of local politicians! Or, to paraphrase the immortal Yogi Berra: “It’s ‘Chinatown’ (the movie) all over again.”

Response GO9-8 Refer to Response GO9-7 for discussion of how the proposed Project does not include a water fountain in the planned LAUS Forecourt. As described on page 2-49 in Section 2.0, Project Description, of the Draft EIR, the proposed Project includes

several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment GO9-9 For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society opposes construction of LAART and the related Esplanade-Forecourt projects in the interests of honest government, Los Angeles Union Station preservation, the environment and above all safety.

Respectfully,

Thomas R. Savio
Executive Director
Los Angeles Union Station Historical Society

Cc: Stephanie Wiggins, Metro CEO

Response GO9-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO9-2 through GO9-8.

Comment Letter GO10 – California State Parks Foundation, Rachel Norton

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO10

Comment GO10-1 Dear Mr. Zelmer:

Thank you for allowing the opportunity to comment on the draft Environmental Impact Report for the Los Angeles Aerial Rapid Transit (LAART) project, released in October.

California State Parks Foundation is an independent, member-supported nonprofit dedicated to protecting and preserving the California state park system, for the benefit of all. Since our founding in 1969, we have endeavored to ensure that every unit of the California state park system is open, welcoming and provides a high-quality recreational experience for the public; and that the irreplaceable natural and cultural wonders of the system are stewarded for future generations to enjoy.

We have taken an interest in the LAART project because of its impact on Los Angeles State Historic Park. The proposed project would cross over the western edge of the park and include a new station adjacent to the current Chinatown station on the Metro Gold Line, as well as a junction just to the northwest on Broadway.

Response GO10-1 This comment provides a general introduction to the comments raised in the letter. Responses to the comments contained in this letter are provided below in Responses GO10-2 through GO10-6. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO10-2 Los Angeles State Historic Park formally opened in 2017 after decades of advocacy by the surrounding community – neighbors in Chinatown wanted a park and they did not rest until this green oasis was created. Today when you visit Los Angeles State Historic Park, you see people exercising and walking their dogs, relaxing on the grass, taking in the stunning view of the downtown skyline, and participating in community activities like exercise classes or arts and crafts. It is a peaceful gathering spot that provides desirable amenities to its low-income neighbors, and one that represents a true respite from its urban surroundings.

Response GO10-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now

the Los Angeles State Historic Park. The planning, developing, and efforts made by State Parks and its partners resulted in a park that provides the "a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles" for the surrounding community, greater Los Angeles, and visitors from around the world, one that the proposed Project is designed to honor and expand upon. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Response GO10-5 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment GO10-3 We are concerned that the construction and operation impacts of the project may permanently alter the peaceful experience of the park. First, the project would require amending the General Plan for the park to include transportation as an acceptable use – a worrisome precedent for other parks in the system. Too often, parks are seen as empty spaces that can be used for infrastructure like roads and power lines. We remain absolutely committed to pushing back against that thinking whenever and wherever it occurs, because parks are already essential infrastructure for health, wealth, and quality of life.

Response GO10-3 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any

other significant and unavoidable construction impacts. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less-than-significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Response GO10-2 for discussion of with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project.

Comment GO10-4 Noise is another concern – impacts will be unavoidable and significant during construction, which is bad enough. The draft EIR also finds that the system will generate between 61 and 64 decibels of additional noise during regular operation. This is just below levels that can affect health in the form of noise pollution, so it's another issue we'll be watching closely.

Response GO10-4 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. As discussed in Response GO10-3, construction of the proposed Project would result in significant and unavoidable impacts with regard to noise. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related

noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. Refer to Section 2.8, Construction, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project.

This comment mischaracterizes the analysis of operational noise impacts in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, which does not find that the proposed Project operations would generate between 61 and 64 decibels of additional noise compared to existing ambient noise levels. As demonstrated on Table 3.13-10, in Section 3.13, existing ambient noise levels in the vicinity of the proposed Project were measured based on L_{day}, L_{night}, L_{dn}, and CNEL. Existing L_{day} ambient noise levels in the Project area range from 53.6 to 69.8 dBA and existing L_{night} ambient noise levels in the Project area range from 48.7 to 65.5 dBA. As demonstrated on Tables 3.13-22, 3.13-23, 3.13-24, and 3.13-25 on pages 3.13-53 to 3.13-58 of Section 3.13, the operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, Federal Transit Administration (FTA) guidelines, and Los Angeles Municipal Code (LAMC). Specifically, as demonstrated on Table 3.13-23 based on the LAMC analysis the proposed Project would result in an increase in ambient noise levels ranging from 0.0 to 4.1 dBA (including both $L_{eq(day)}$ and $L_{eq(night)}$). The increases are all below the 5 dBA Leq LAMC threshold and no operational impact would occur under the worst-case scenario that assumed the highest line speed, cabins per hour, and queueing numbers, and nighttime operations.

In addition, refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment GO10-5 Finally, it is very difficult to tell from the materials that have been released thus far what the impact of the proposed project will have on the park's views and vistas. While we understand that some of these concerns are beyond the scope of what is required in an Environmental Impact Report, park vistas are an important part of the experience at Los Angeles State Historic Park. We request that California State Parks and Los Angeles Metro prepare a set of visuals that show what park visitors in the southwestern third of the park would see and experience at ground level after the proposed project is constructed.

Response GO10-5 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San

Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional visual simulations of the Park to further analyze viewshed impacts to the Park, in response to comments received on the Draft EIR. As demonstrated by these supplemental KOPs, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Refer to Response S2-5. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment GO10-6 Proponents of the project seem to believe that the potential of taking cars off the road is worth any potentially serious impacts to the park's visitor experience. To us, this is a false choice – in Los Angeles, as in most urban areas in California, it is increasingly expensive to carve out additional green open spaces, even though we know that these spaces are vital to the quality of life and health of the surrounding community. We ask that you commit to additional efforts to study and fully understand the proposed project's impact on the park's General Plan, ambient noise and views prior to any action to approve and implement this project.

Thank you for the opportunity to offer these thoughts and concerns. I would be happy to discuss them further should you have questions.

Sincerely,

Rachel Norton
Executive Director
California State Parks Foundation

Response GO10-6 Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed

Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Response GO10-3 for discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan and the Los Angeles State Historic Park General Plan Amendment. Refer to Response GO10-4 for discussion of the construction and operational noise impacts from the proposed Project, which would be less than significant. Refer to Response GO10-5 for a discussion of the aesthetic impacts of the proposed Project, including to views from the Los Angeles State Historic Park, which would be less than significant.

Comment Letter GO11 – Los Angeles Union Station Historical Society, Thomas R. Savio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO11

Comment GO11-1 Dear Mr. Zelmer,

I was present at the meeting hosted by you, and/or LA Metro, Frank McCourt, Los Angeles Aerial Rapid Transit, ClimateResolve, Cathedral High School and Does 1 to 10. I attended as the representative of the Los Angeles Union Station Historical Society (LAUSHS). Here are my recollections that in my opinion bring into question the legitimacy of the meeting:

Response GO11-1 This comment provides a general introduction to the comments raised in the letter. Responses to the comments contained in this letter are provided below in Responses GO11-2 through GO11-4.

Comment GO11-2 A) Although I arrived at Cathedral High School meeting venue at the beginning of the meeting, I was delayed by thirty minutes getting to the venue because there was no Disabled Parking in or around Cathedral High School. (This has since been confirmed by Cathedral High School staff.) Consequently, I was late because I am a Disabled Person, and since all normal street parking was occupied by residents and/or meeting participants, I was obliged to park on the sidewalk after driving about for nearly 30 minutes, in fear of not representing the views of the LAUSHS. Consequently, I waddled with cane in hand to the distance to the meeting. This, in our opinion, a reasonable person would conclude that Mr. Zelmer and/or other "hosts" do not care about providing reasonable accommodations for Disabled Persons and myself. Furthermore, it indicates to us Mr. Zelmer's indifference to the Disabled and/or his incompetence in hosting same at the public meeting.

Response GO11-2 Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Cathedral High School has at least five accessible parking spaces within the school campus, including within on campus parking lots accessible from Bishops Road, North Broadway and Cottage Home Road. The lots that these spaces are in were available to attendees during the January 12, 2023, public hearing. Refer to Response GO11-3 for discussion of the January 12, 2023, public hearing.

Comment GO11-3 B) When I finally entered the meeting, it had the appearance and sound of a near riot. I was told by bystanders that the spontaneous demonstration was because Mr. Zelmer and other hosts refused to take any questions of the 70 to 100 members of the local community in attendance. It is our opinion that a reasonable person might

conclude that Mr. Zelmer is incompetent in representing Metro, and LAART in a public forum.

Response GO11-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR.[6] After the protesters left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual

[6] LA Aerial Rapid Transit Technologies LLC. 2023. Memorandum Regarding LA ART Draft EIR Public Hearing No. 3 – Consultant Experiences During Protest.

February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment GO11-4 C) Furthermore, the working press and Community representatives said that they were told to ask Brother John Montgomery, Principal of Cathedral High School for answers to their questions on LAART. Brother John is not to our knowledge a credentialed transit or environmental expert. (All known nonaligned experts and the Sierra Club are against the Gondola.) Brother John then extolled to them via nation-wide TV, the reasons he saw for building the Gondola, without mentioning the pertinent fact that his employer, Cathedral High School, gets significant funds from Frank McCourt, an apparent conflict of interest in our opinion.

Response GO11-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023, public hearing held along the proposed Project alignment at Cathedral High School. The format of the January 12, 2023, public hearing was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the Cathedral High School Gymnasium, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. Neither Metro nor the Project Sponsor directed attendees to direct questions about the proposed Project to Cathedral High School staff, and meeting staff at the Welcome Table provided attendees with roadmaps for the stations around the gymnasium. Refer to Response GO11-3 for discussion of the public comment opportunity at the January 12, 2023, public hearing. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO11-5 D) Therefore, the Los Angeles Union Station Historical Society has concluded that given all the above, the legal validity of the meeting was compromised and that a new meeting should be rescheduled with a live democratic give-and-take on the issues, better crowd control and hosted by an uncompromised Metro meeting expert, not Mr. Zelmer who a reasonable person might conclude is compromised by an apparent conflict of interest in that he is a Metro employee in charge of investigating the Gondola project for the public weal whilst his salary is gifted to Metro by the Gondola's chief antagonist Frank McCourt.

Respectfully,

/s/
Thomas R. Savio
Executive Director,
Los Angeles Union Station Historical Society

Cc. Stephanie Wiggins, Metro CEO

Response GO11-5 Refer to Responses GO11-2 through GO11-4 for discussion of the January 12, 2023, public hearing for the proposed Project's Draft EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of how, in light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. Certain attendees who expressed concerns about the proposed Project nonetheless shared positive feedback with Metro for the facilitation of this public hearing, including thanking Metro for the "calm, collected, and objective facilitation of this hearing this evening," "inviting a Toisan interpreter and obliging access needs in the meeting," and "continuing this meeting past the time . . . to hear so many of my neighbors views." An estimated 168 attendees participated in the February 8, 2023, continued public hearing, and Metro received 82 verbal comments on the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As is customary, the Project Sponsor is reimbursing Metro for its time on the proposed Project as the Lead Agency under CEQA.

Comment Letter GO12 – Sierra Club

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO12

Comment GO12-1 Dear Mr Zelmer:

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

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

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

Response GO12-1 This comment provides a general introduction to the comments raised in the letter. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO12-2 The Introduction sets forth the conclusion that Metro is the "lead agency" and as such has the authority to approve the project and implement mitigation measures. However, significant concerns have been raised by The California Endowment and the LA Parks Alliance that Metro is not in fact the appropriate "lead agency" for the LA ART, particularly as the proposed project for the stadium parking lot is private in nature. Rather, the City of Los Angeles is the appropriate lead agency on the basis of its general governmental powers and its direct accountability to its constituents. We concur with these concerns and particularly express concerns with the dedication of Metro's employees and significant resources to this private project.

Response GO12-2 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to

do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. The City participated in the environmental review process as a CEQA responsible agency and has cooperated in that process, including consultation in preparation of the Draft EIR. Contrary to this commenter's assertion, CEQA does not require a lead agency to be an elected decision-making body. (See generally Pub. Resources Code, § 21067; CEQA Guidelines, § 15367.) Further, CEQA's various requirements for consultation with agencies and for public review and comment ensures the full transparency and accountability of the lead agency. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment GO12-3 ES 2 Project Purpose/ES 5 Project Overview: There is significant doubt as to whether the LA ART would alleviate congestion and air pollution, which in turn is a fundamental premise of the Draft EIR. The UCLA Mobility Lab Study dated October 24, 2022, concludes the gondola will do little to reduce traffic and green-house gas emissions. We concur with the concerns raised by the study. The study also casts significant doubt on the Draft EIR Section 1.0 conclusion that LA ART is an "environmental leadership transit project" that is in turn entitled to streamlined judicial review.

Response GO12-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. On

January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Further, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[7] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. Any differences between the findings in the Mobility Lab Study and the Draft EIR are therefore to be expected and are explainable. Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or inappropriate for use. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over the useful life of the Project would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Comment GO12-4 In particular, the multiple Draft EIR references to the "5,000 people per hour" gondola capacity are refuted by the UCLA Mobility Lab Study. The Draft EIR further assumes patrons would use the gondola both before and after events.[2] However, the study

[7] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

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

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

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

Response GO12-4 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Response GO12-3 and Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. Specifically, refer to Response ML-5 in Topical Response O, Response to UCLA Mobility Lab Study. Within two hours prior to the start of a game or event at Dodger Stadium, more than 10,000 people could be transported to the Stadium via the proposed Project. Given the capacity of this system, approximately 20 percent of the fans could take the proposed Project. As discussed in Section 3.17, Transportation, of the Draft EIR, the ridership model estimated that 6,000 passengers would ride the proposed Project in 2026 and 10,000 passengers would ride the proposed Project in 2042. Refer to Response ML-5 in Topical Response O, Response to UCLA Mobility Lab Study and Topical Response B, Ridership Model; Pre-game and Post-game Transportation, for further discussion of post-game ridership. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board

the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As detailed on page 3.17-35 of Section 3.17, Transportation, of the Draft EIR, the Draft EIR includes estimates of ridership for events at the Los Angeles State Historic Park, as well as for neighborhood riders on non-game days, which are lower than game day ridership estimates as noted by the commenter. As noted on page 3.17-34 of the Draft EIR, ridership on these days was not taken into account in the quantitative analysis of vehicle miles traveled (VMT) reduction benefits of the proposed Project in the Draft EIR to ensure a conservative analysis.

Elysian Park has limited transit access, and is not served by a fixed guideway transit connection. The proposed Project would improve transit access to Elysian Park, which would provide an additional high-capacity sustainable transportation option that does not exist today. As discussed in Section 5.0, Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment GO12-5 The Draft EIR is also incomplete and lacking in transparency in that it is focused solely on the gondola. Neither the Purpose nor Project Overview discussions address commercial developments apparently contemplated by Mr. McCourt for the stadium parking lot or how the parking lot might ultimately be reconfigured to allow commercial development.[4]

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

Response GO12-5 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station

Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. The Dodger Stadium property is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated by commenters. Accordingly, the Draft EIR analyzed all reasonably foreseeable development.

Comment GO12-6 We concur with the concern that the gondola is essentially a private project that is proposed to be built using public resources and over public rights-of-way and publicly owned property.

Response GO12-6 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.5, Proposed Project Alignment and Components, and Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties.

Comment GO12-7 The failure to address commercial development of the parking lot and resulting increase in traffic and greenhouse gas emissions from development renders it impossible to evaluate the overall impact of the proposed project on traffic and greenhouse emissions. Consequently, the conclusions on ES page 53 and elsewhere in the report that construction and operations of the LA ART would have a "less than significant impact" on greenhouse gas emissions are not supported.

Response GO12-7 Refer to Response GO12-5 for a discussion of how the proposed Project solely proposes an aerial gondola system and does not include other development, and, accordingly the Draft EIR analyzed all reasonably foreseeable development. Refer to Response GO12-3 and Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion

of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment GO12-8 Moreover, the LA ART does not serve any broad public purpose. The suggestion that the gondola might possibly serve communities near LAUS and Dodger Stadium is not persuasive. These communities are within walking, biking, or Dash bus ride distance of LAUS, State Historic Park and the Stadium. The communities may also be served by the Metro Micro on-demand rideshare service that is already operating in many other Los Angeles communities including the Highland Park/Eagle Rock/Glendale service zone.

Response GO12-8 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project aims to enhance community connectivity in Metro-designated Equity Focused Communities by providing first/last mile transit and pedestrian access in areas that have historically been underserved, including Los Angeles State Historic Park and Elysian Park. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment GO12-9 The Draft EIR highlights gondolas operating in various foreign countries such as Bolivia and Mexico, but it does not describe the Portland Aerial Tram or NYC's Roosevelt Island Tramway. The Portland Aerial Tram is actually operated for the public benefit, i.e., primarily for patients, students and staff commuting year-round between two Oregon Health and Sciences University locations and incidentally for the general public.[5] Similarly, the Roosevelt Island Tramway provides daily commuter transportation between Roosevelt Island and the Upper East Side of Manhattan and primarily serves workers. The Portland and Roosevelt Island tram services can serve as templates for Los Angeles's broader public purposes such as transportation to our major year-round employment centers, medical facilities and already existing year-round entertainment/cultural centers and reduction of greenhouse gas emissions.

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

Response GO12-9 Refer to Table 2-1: ART Precedents, in Section 2.0, Project Description, of the Draft EIR, for discussion of the Portland, Oregon, and Roosevelt Island, New York, reversible tramways. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Response GO12-8 for an overview of the need for the proposed Project. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO12-10 ES 7 Proposed Project Alignment - Impact on State Historic Park and Views:

The City of Los Angeles should jealously guard and preserve the jewel that is State Historic Park rather than permit the diminishment of this public open space.[6] The construction and operation of the Chinatown/State Park station on park land is at complete odds with these goals of protection and preservation. The Draft EIR contemplates at Section 2.9.4 that the Chinatown/State Park Station would have a footprint of 2,605 square feet including 2,195 square feet within the southernmost part of State Historic Park.[7] Further, the station canopy would have an overhang of 9,320 square feet over the park. Eighty-one trees would need to be removed (including 75 from the park and six from the public right-of-way adjacent to the park) with an unspecified number of trees to be replaced.

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

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

Response GO12-10 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

The El Pueblo de Los Angeles Historical Monument is currently a department of the City of Los Angeles.[8] Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR, for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources, including the Los Angeles Plaza Historic District (referred to as El Pueblo de Los Angeles). Construction and operational historic resources impacts associated with the proposed Project would be less than significant, including with respect to the Los Angeles Plaza Historic District.

Comment GO12-11 This assumes LA ART is able to obtain the requisite approvals from the California Department of Parks and Recreation for the proposed uses.[8] Such approval is not feasible, as state park historic units may only include facilities that "are required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking."[9] A gondola boarding station and tower are not required for these park visitor purposes.

Footnote 8: Draft EIR Section 2.10.

Footnote 9: Cal. Public Resources Code section 5019.59.

Response GO12-11 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. The proposed Project does not include a tower in the park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment GO12-12 The Draft EIR notes that one of the principles in the Park's General Plan is to "Promote a 'Touchstone Landscape' for Reflecting on Los Angeles' Natural and Cultural

[8] See City of Los Angeles. 2023. Commission, El Pueblo de Los Angeles Historical Monument. Available at: https://elpueblo.lacity.gov/commission. Accessed July 2023. See also, California Department of Parks and Recreation. 2023. California State Parks Listing. Available at: https://www.parks.ca.gov/?page_id=21805. Accessed July 2023 (El Pueblo de Los Angeles is not included on this list).

Heritage" by making the Park a place of inspiration, reflection and appreciation of history and nature through the interpretation of the Los Angeles River."[10] Installing a massive gondola tower and station within State Historic Park for a sports stadium destination does not comport with this inspirational principle. Rather, it is an abuse of public land designated for this historic purpose and for open space values.

Footnote 10: Draft EIR Page 3.4-3.

Response GO12-12 Refer to Response GO12-10 for discussion of how the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response GO12-11 for discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan.

Comment GO12-13 We also disagree with the Draft EIR conclusions that the LA ART "would not substantially degrade the existing visual character or quality of public views . . . of the site and its surroundings and the impact would be less than significant", particularly as these conclusions apply to State Historic Park, the Broadway Junction and Dodger Stadium.

Response GO12-13 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The Draft EIR's analysis of impacts to aesthetics was prepared by experts in their respective fields, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO12-14 The proposed Chinatown/State Park Station and massive three level, 98-foot tower at the station are completely at odds with the existing park entrances, landscaping, layout and amenities, which provide pedestrians and bicyclists with a beautiful, restorative atmosphere. The proposed station and the 98-foot tower would detract from the park's stunning views of the downtown skyline[11] to the south and the San Gabriel and San Bernardino Mountains to the north. The Draft EIR authors concede at Page 3. 1-43 that the "Chinatown/State Park Station is a new and large visual element in the landscape, and views of residents would already be altered noticeably".

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

Response GO12-14 Refer to Response GO12-13 for discussion of the aesthetics analysis for the proposed Project. Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics. Refer to Section 3.01, Aesthetics, of the Draft EIR, for discussion of how the proposed Project's design and building materials would complement the architectural themes of the neighborhood and would complement the visual character of the existing buildings in the area. Potential impacts to visual quality and character are minimized by the location of the Chinatown/State Park Station in the southernmost portion of the park, away from the open passive park areas. The proposed Project components would consist of a modern architectural design, which would complement the existing modern style buildings in this area. In addition, the neutral light-tone gray of the proposed Project components would be consistent with modern structures in the surrounding urban environment. The new amenity building intended for use by proposed Project riders and park visitors alike are designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park.

Refer to Response GO12-13 for discussion of how the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Comment GO12-15 The report's authors go on to suggest at Pages 3. 1-43 and 3. 1-46 that the noticeable alterations created by the station would not be so bad because residents and park goers would be compensated by a "potential" mobility hub, 740 square feet of new concessions, restrooms, landscaping and hardscaping, pedestrian improvements and "potential" seating. But this is no consolation at all because State Historic Park already offers all of these features including an in-park restaurant and many other restaurants easily within walking distance. The suggestion that the park's scenic views should be

compromised for a little more landscaping and hardscaping in a beautifully landscaped/hardscaped 32-acre park is not persuasive.

Response GO12-15 This comment provides a general recitation and characterization of the Draft EIR. Refer to Responses GO12-13 and GO12-14 for discussion of the aesthetics impacts of the proposed Project, which would be less than significant. Through continued collaboration with State Parks, which has been ongoing and will continue through the Los Angeles State Historic Park General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from the park's purpose and objectives. For example, in addition to the concessions, restrooms, and breezeway discussed above, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/ State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. In addition, the station canopy would provide much needed shade. Refer to Topical Response C, Project Features, for further discussion of how the proposed Project would include a mobility hub at Chinatown/State Park Station and provide open space enhancements.

Comment GO12-16 Likewise, the Draft EIR suggestion at page 3.1-45 that "existing views of downtown from within the park are already interrupted under existing conditions by trees and intervening development" does not justify the additional massive and continuous gondola interruptions proposed by LA ART (assuming for purposes of argument only that trees constitute an interruption of the view).

Response GO12-16 Refer to Response GO12-13 for discussion of how the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment GO12-17 Even though the Chinatown/State Park Station is proposed to allow passenger boarding, the Draft EIR makes no reference to parking for passengers boarding at the station. State Historic Park is already served by the Metro Chinatown station (located within yards of the park's beautiful main entrance!) and nearby LAUS and thus the park would not benefit much from the proposed boarding station.[12]

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

Response GO12-17 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment GO12-18 Moreover, the proposed alignment of the gondola directly over a long stretch of State Historic Park (and thus over park goers) and directly over and past private residences is invasive and contrary to current recreational and residential uses. The Draft EIR indicates cabins near the Broadway Junction would "be constantly moving in and out of view"[13] and could be seen from residents and yards and from inside their residences. The resulting disturbance and intrusion to park goers and nearby residents would persist during construction and year-round, daily gondola operation.

Footnote 13: Draft EIR Page 3. 1-48.

Response GO12-18 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be

located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Comment GO12-19 The proposed 179-foot Stadium Tower and massive 37,000+ square foot Dodger Stadium Station are completely at odds with the character of Elysian Park[14] and the Stadium's peaceful park setting.[15] The Draft EIR does not in our view adequately address any of the foregoing concerns.

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

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

Response GO12-19 As discussed in Section 2.0, Project Description, of the Draft EIR, Elysian Park is the second oldest and largest park in the City and features hiking trails, a bike path, and various recreational and event facilities. The Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate and SR-110, and would include the installation of landscaping near the base of the tower. The Dodger Stadium Station would be located on private property adjacent to Dodger Stadium in a portion of the existing parking lot in the southeast portion of the Dodger Stadium property near the Downtown Gate. The Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating, and a mobility hub to provide connectivity to Elysian Park and the surrounding communities where outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods. Thus, the proposed Project's Stadium Tower and Dodger Stadium Station would provide features that complement the character of Elysian Park and Dodger Stadium.

Refer to Section 3.01, Aesthetics, of the Draft EIR, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed

Project, which would be less than significant. As described on page 3.1-49 of the Draft EIR, the proposed locations for the Stadium Tower and Dodger Stadium Station are located within Landscape Unit 6 (LU-6). Draft EIR pages 3.1-49 through 3.1-51 include an analysis of the proposed Project's potential aesthetic impacts within LU-6, based on a series of qualitative thresholds commonly used by the FHWA for evaluating visual and aesthetic changes (Draft EIR page 3-1-31). The Dodger Stadium Station and Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Dodger Stadium Station and Stadium Tower were selected to complement the surrounding urban environment in LU-6, and to not distract from existing visually distinct structures, such as Dodger Stadium. This analysis specifically finds that the proposed Project would not result in a substantial adverse effect to the visual character or quality of the Elysian Park open space or Dodger Stadium property. These conclusions are based on a number of factors, including: the "moderate" visual quality of the area; that the stadium is located on private (not public) property; LU-6 is an urbanized area with a mix of architectural styles and structures; Elysian Park views are currently interrupted and compromised by existing urban development and existing overhead transmission lines; the area has low to moderate view sensitivity because it is experienced primarily by visitors; and, the stadium itself is not affected by project changes. The aesthetic effects of the proposed Project are fully disclosed within the Draft EIR, and no further analysis is required.

Comment GO12-20 ES 8 System Operations; Costs?: The Draft EIR does not specify how construction or post-construction operating, security, maintenance costs and power costs would be funded and paid, even though it is specified that all these elements would be required for proposed daily operation. Apparently, this lack of specificity arises because financing has not been fully worked out.[16] This of course raises the issue of whether taxpayers will end up footing these year-round costs for the McCourt family's private gain.

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

Response GO12-20 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs

and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project.

Comment GO12-21 ES 11 Alternatives to Reduce Significant Impacts: We concur with the Draft EIR in one respect, namely, the TSM Alternative, which contemplates enhancing the Dodger Stadium Express Service, is the Environmentally Superior Alternative, particularly when operated with zero emission buses.

Response GO12-21 Refer to Response GO12-22 for discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express, which is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives.

Comment GO12-22 However, the TSM Alternative is not addressed adequately in the Draft EIR. No doubt the existing Express Service can be expanded in size and staging locations. The operation of the massive Park and Ride and Bowl Shuttle bus service between the Hollywood Bowl and various sites in the city during the concert season (including bus only lanes) demonstrates the viability of expanding the Dodger Express Service.

Response GO12-22 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which,

similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. And, as discussed above, increased bus service from remote locations around Los Angeles County to and from Dodger Stadium would add to rush hour traffic and congestion.

As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Comment GO12-23 Moreover, the development of an off-site loading facility for the TSM Alternative would be far less disruptive to State Historic Park and surrounding communities than the LA ART. In fact, the TSM Alternative would not have any impact on the park. As for bus lanes, Cesar Chavez and Broadway lane closures and diversions are already utilized on game days and expansion of such lanes appears viable. The LA Zoo parking lot provides an excellent bus loading/unloading location.

Response GO12-23 Refer to Response GO12-22 for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives. Refer to Section 4.0, Alternatives, of the Draft EIR, for discussion of how the Transportation Systems Management Alternative assumes a larger, off-site loading facility at Metro's Division 13 maintenance facility. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17,

Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including at the Los Angeles State Historic Park.

Comment GO12-24 The Spring Street Alignment, which contemplates the construction of a gondola station within Historic Park, is mentioned as an alternative. This alignment is unacceptable in our view, as it would destroy part of this refuge that was over 17 years in the making and block part of the open sky above the park.

Response GO12-24 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Draft EIR considered a "No Project Alternative," the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Similar to the proposed Project, the Spring Street Alignment Alternative would provide an ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. The Spring Street Alignment Alternative would include three stations, a non-passenger junction, and four cable-supporting towers at various locations along the alignment. The Spring Street Alignment Alternative would include the following components in common with the proposed Project: Alameda Station, Alameda Tower, Alpine Tower, Stadium Tower, and Dodger Stadium Station. In addition to these components, the Spring Street Alignment Alternative would also include the following components that would be unique to this alternative: Spring Street Junction, State Historic Park Station, and Bishops Tower. Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint than the proposed Project within the Los Angeles State Historic Park, so it would not meet Objective 11 to "Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project" to the same extent as the proposed Project.

Comment GO12-25 Other transportation related alternatives that would serve to conserve energy and reduce green-house gas emissions are (i) the construction of solar panels in the stadium parking lot, (ii) the addition of electric vehicle charging stations and bike share facilities in the lot and (iii) the expansion of the Dash bus service to Elysian Park and State Historic Park. These alternatives are not mentioned in the Draft EIR, which apparently was drafted to present the gondola as the only option. It is not.

Response GO12-25 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Project Objectives were defined in order to assist Metro in

considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The Project Objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. All of the alternatives suggested in this comment would fail to meet the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. All of the alternatives would fail to meet many of the Project Objectives, including to expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, to improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium, and to bring a world class aerial transit system to the Los Angeles area. The alternatives would otherwise fail to improve connectivity and reduce vehicle congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. While the third alternative would improve access to Elysian Park and the Los Angeles State Historic Park, it still does not meet other objectives aimed at achieving the Project's purpose of providing a transit connection to Dodger Stadium. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. The proposed Project does not preclude the "alternatives" mentioned in the comment.

Comment GO12-26 ES 12 Design Options: Design and Use Option E, contemplating the construction of a pedestrian bridge in Historic Park, is attractive but clearly may be accomplished without construction of the gondola.

Response GO12-26 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los

Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment GO12-27 ES 13 Summary of Environmental Impacts: Contrary to this summary, the proposed 98-foot tower at the Chinatown/State Park Station would in fact block and degrade part of the scenic vista and view of the downtown skyline that is observable from Historic Park.

Response GO12-27 Refer to Response GO12-13 for discussion of how the aesthetic impacts of the proposed Project would be less than significant, including at the Los Angeles State Historic Park, and the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment GO12-28 In sum, the Draft EIR is incomplete and inaccurate in significant respects and lacking in transparency. It misrepresents the potential impact of the LA ART on ridership and the reduction of greenhouse gas emissions. There are better and less intrusive ways to transport people to and from Dodger Stadium, Elysian Park and surrounding communities while also preserving and even improving State Historic Park and these communities. Any gondola built within the City of Los Angeles must serve a much broader public purpose than moving passengers between LAUS and Dodger Stadium.

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

Sincerely,

Barbara Hensleigh
Chair, Central Group (Los Angeles)
Angeles Chapter
Sierra Club

Copies:
Mayor Karen Bass
Supervisor Hilda L. Solis, First District
Councilperson Eunisses Hernandez, District 1
The California Endowment, 1000 Alameda Street., Los Angeles, CA 90012
LA Parks Alliance

Response GO12-28 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments contained in this letter are provided above in Responses GO12-1 through GO12-27. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and

decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment Letter GO13 – Natural Resources Defense Council (NRDC), Paulina Torres

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO13

Comment GO13-1 Dear Mr. Cory Zelmer:

We appreciate the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Aerial Rapid Transit Project ("Project"). These comments are on behalf of the Natural Resources Defense Council and our many thousands of members and activists throughout California. Our comments are offered to ensure Metro's consideration of the Project complies with the California Environmental Quality Act ("CEQA"), California Code of Regulations, Title 14, § 15000 et seq. ("CEQA Guidelines"), and the Los Angeles CEQA Threshold Guide. We urge Metro to consider the issues identified below and to update the EIR to fully and accurately describe the Project and analyze its impacts.

NRDC has a vested interest in preserving the quality, character, accessibility, and enjoyment for those visiting the Los Angeles State Historic Park given our decades-long advocacy along with many other community allies to protect and create the parkland. Los Angeles State Historic Park was created after a tremendous community campaign to defeat a warehouse development plan that threatened the 32-acre open space. We offer the following comments to ensure Metro adequately considers all the impacts the Project will have on the park and adjacent downtown Los Angeles neighborhoods.

Response GO13-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter provided below in Responses GO13-2 through GO13-13.

Comment GO13-2 I. The DEIR's impact analysis is flawed and should be revised.

The DEIR appears to employ an overly broad and contradictory analytic approach that may not describe with adequate specificity the full range of significant negative impacts the Project will have on the aesthetic and cultural characteristics of the Project site and surrounding areas. As such, a court might find that the DEIR fails in its basic purpose as a useful, informational document for the public and decision makers.[1]

Footnote 1: Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.

Response GO13-2 The comment states that the Draft EIR's impact analysis is flawed and should be revised, but does not identify a specific flaw. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As discussed

therein, the aesthetics analysis took into account six separate landscape units, scenic vistas, scenic resources, light and glare, and shading, considering key observation points critical or representative of the visual character of the area, concluding that such impacts would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources in 71 pages of detailed analysis of 12 previously identified historical resources, including two districts with multiple contributors, and 51 archaeological resources that were previously recorded within an eighth-mile of the proposed Project's Area of Direct Impacts, with eight archaeological resources identified for further analysis, with supporting data provided in the 125-page Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and in the 343-page Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. The Draft EIR's analysis of impacts to aesthetics and cultural resources was prepared by experts in their respective fields, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. In general, the Draft EIR includes 7,877 pages of detailed analysis from experts intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO13-3 A. The DEIR's aesthetic impacts analysis should be augmented and revised.

The DEIR presents an insufficient analysis of the aesthetic impacts the Project will have on the immediate surrounding areas, particularly near Los Angeles State Historic Park. The DEIR divides the immediate vicinity of the Project alignment into six different Landscape Units that encompass the location of the Project alignment and adjacent areas beginning in the southern portion of the Project alignment and ending in the north. Of most significance, the DEIR does not sufficiently analyze the aesthetic impacts to Landscape Unit 4, which begins at the southwestern corner of Los Angeles State Historic Park. The LA CEQA Thresholds Guide notes the value of preserving sightlines to designated scenic resources or areas of visual interest from public vantage points. The DEIR acknowledges that the subjects of valued or recognized views may be focal or panoramic, including urban skylines, mountain ranges, or large bodies of water. The DEIR further acknowledges the Project's interruption to the panoramic skyline views of downtown Los Angeles from Los Angeles State Historic Park.

Response GO13-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The methodology utilized to examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). As a result of this guidance, a group of Landscape Units (LU) and Key Observation Points (KOPs) were delineated and identified based on known significant views and locations with proposed changes to the setting and subjected to review and analysis identified within the aforementioned framework. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Further, views and potential impacts were all analyzed using the same thresholds of significance identified by the State CEQA Guidelines and the Los Angeles CEQA Thresholds Guide.

Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Also, the location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Response S2-5 for additional discussion of the Draft EIR aesthetics analysis as it relates to the Los Angeles State Historic Park.

The Draft EIR's analysis of impacts to aesthetics was prepared by experts in their respective fields, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO13-4 Los Angeles Historic State Park is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles.[2] Sometimes referred to as the "front porch" of Los Angeles, there are no other sites that capture this welcoming view of downtown.[3] Despite acknowledging the aesthetic significance of the downtown Los Angeles urban skyline, the DEIR concludes the Project will have no significant impact for a variety of unpersuasive reasons. For example, the DEIR vaguely relies on a "walkway in the park" as an area that will continue to have uninterrupted views.[4] The DEIR further asserts that there are no significant aesthetic impacts because "existing views of downtown from other areas in the park are already interrupted under existing conditions by trees."[5] The mere possibility that one may potentially be able to find an area within the park where the view may be seen would not seem to negate the significant negative impact to a designated area of visual interest. CEQA does not require that a view be hindered from every possible vantage point; rather, CEQA demands an inquiry into whether the Project would have potentially significant impacts with respect to views if the Project's development were to obstruct an existing view of a valued visual resource.[6]

Footnote 2: Los Angeles State Historic Park General Plan (2005), https://lastatehistoricpark.org/wpcontent/uploads/2021/07/LASHP-General-Plan.pdf.

Footnote 3: Id. at 38.

Footnote 4: Draft Environmental Impact Report, Appendix C- Visual Impact Assessment at 74,

https://www.dropbox.com/sh/trfpt09to0kp4a8/AACPE0qySShhT2mqXi172mAha/Documents/Draft%20EIR%2010.17.22/Draft%20EIR%20and%20Appendices?dl=0&preview=Appendix+C_VIA.pdf&subfolder_nav_tracking=1.

Footnote 5: Id.

Footnote 6: California Code Regs., title 14, Section 15000 Appendix G.

Response GO13-4 Refer to Response GO13-3 for discussion of how the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Response S2-5 for a more detailed discussion of aesthetic impacts to the Park. The Draft EIR addressed aesthetic impacts in Section 3.01 Aesthetics with supporting data provided in Appendix C, Visual Impact Assessment of the Draft EIR. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within

the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the Park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. The Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental KOPs, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the Park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the Park.

Comment GO13-5 Further, the DEIR purports to describe its consistency with the Los Angeles State Historic Park General Plan. For a project in an urban area, a significant impact to visual character or quality occurs if the project conflicts with applicable zoning regulations or other regulations governing scenic quality. The DEIR appears to contain contradictory statements regarding the Project's consistency with the Los Angeles State Historic Park General Plan. On the one hand, it states that the proposed Project must obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the park. However, later in the DEIR it states that the proposed Project would be consistent with Los Angeles State Historic Park General Plan aesthetic resources goals to protect and enhance scenic viewsheds and features. Not only does the DEIR appear to lack any description of the Project's ability to protect and enhance scenic viewsheds and features, but the document also fails to acknowledge the project's existing inconsistency with the Los Angeles State Historic Park General Plan, which prohibits the very type of (transit) Project proposed.

Response GO13-5 Refer to Response GO13-3 for discussion of how the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.. Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a

discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO13-6 The DEIR also appears to minimize the significant negative visual impacts the Project will have on the surrounding area. For CEQA purposes, visual impacts in urbanized areas are assessed based on changes to views from publicly accessible locations or public views. However, in finding that the Project will have no significant impact, the DEIR states that pedestrians and motorists may have less of a personal investment in the visual appearance of the proposed Project because they are "primarily visiting and do not necessarily reside in the area." The DEIR relies on residents not being included in viewership, while simultaneously minimizing negative impacts by asserting that public viewers have "fleeting and/or temporary views" since they do not reside in the area. The DEIR posits a circular argument, obviating the possibility that pedestrians and motorists experience significant impacts since CEQA requires the Lead Agency to only consider the views of the public, then relying on the presumption that the public could never experience a significant impact since their views are temporary as non-residents. This type of reasoning would render the viewership analysis requirements of CEQA meaningless.

Response GO13-6 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. A series of visual simulations were conducted from/within Landscape Units (LU) and Key Observation Points (KOPs) that were delineated and identified based on known significant views and locations with proposed changes to the setting. Viewer groups potentially affected by the proposed Project were identified in each LU as set forth in Table 3.1-6. For example, viewer groups identified for LU 4 which includes the Park are: motorist, transit commuter, pedestrian, and recreationalist. Because visual impacts under the L.A. CEQA

Thresholds Guide are assessed based on changes to public views, the description of resident viewer groups was provided only for informational purposes as private views from residential properties are not protected under the L.A. CEQA Thresholds Guide. This description of resident viewer groups was provided for informational purposes only with the understanding that, even within different viewer groups, visitors and residents likely hold unique values regarding the significance of views within/of each individual LU, and the significance of an impact is not based solely on a project's visibility from public viewpoints. In the evaluation of aesthetics, the Draft EIR analysis considers a range of qualifying factors consistent with methods and guidance provided by the FHWA for evaluating visual impacts, as well as the CEQA Guidelines and City of Los Angeles CEQA thresholds. Accordingly, the Draft EIR's aesthetics analysis more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO13-7 CEQA requires the data in an EIR to be not only sufficient in quantity but presented in a manner calculated to adequately inform the public and decision makers.[7] Given the inconsistencies throughout the DEIR's examination of potential aesthetic impacts, we urge Metro to include an accurate and robust analysis of the Project's aesthetics impacts, particularly as these impacts affect Los Angeles State Historic Park.

Footnote 7: Public Resources Code Section 21000 et seq.

Response GO13-7 Refer to Response G013-3 for discussion of the Draft EIR analysis of potential aesthetic impacts from the proposed Project, which would be less than significant. Refer to Responses GO13-5 and GO13-6 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics as well as how the Draft EIR's analysis does not result in "inconsistencies" but appropriately analyzes potential impacts based upon the CEQA Guidelines, L.A. CEQA Thresholds Guide, and methods and guidance provided by the FHWA. The Draft EIR's analysis of impacts to aesthetics was prepared by experts in the field, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR's aesthetics analysis more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO13-8 B. The DEIR's analysis of impacts to cultural resources is flawed and should be revised.

CEQA and its implementing guidelines require the evaluation of potential impacts to cultural resources.[8] The evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so; (2) a determination of whether the Project would result in a "substantial adverse change" in the significance of the resources. A "substantial adverse change" in the significance of a historical resource is an alteration that materially impairs the characteristics that convey its historical significance and justify its eligibility for listing.

Under these guidelines, the DEIR does not appear to adequately analyze the Project's impact on cultural resources. The proposed Project is located within the urbanized and developed City of Los Angeles communities of downtown, El Pueblo, Chinatown, Mission Junction, Solano Canyon, and Elysian Park. These areas are known, in part, for their rich historical and cultural resources including over thirty culturally significant buildings, sites, districts, structures, and landscapes within the immediate vicinity of the Project alignment. While the DEIR acknowledges the significant presence of cultural resources the Project may affect, it denies without explanation any significant impacts to the resources.

Footnote 8: CEQA Guidelines Section 15064.5.

Response GO13-8 Refer to Response GO13-2 for a discussion of the Draft EIR's analysis of the proposed Project's potential impacts to cultural resources. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Response GO13-9 for a discussion of how construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of the Los Angeles Union Station Passenger Terminal and Grounds and, therefore, impacts will be less than significant. Refer to pages 3.5-45 and 3.5-46 of Section 3.05, Cultural Resources, of the Draft EIR for a discussion of how the only direct impacts from the proposed Project to the Los Angeles Plaza Historic District (El Pueblo) would be to a non-contributing feature, the Placita de Dolores, which was constructed after the historic district was designated, and accordingly impacts would be less than significant.

Refer to pages 3.5-46 to 3.5-47 of Section 3.05, Cultural Resources, of the Draft EIR, for discussion of how the proposed Project would not significantly impact the *El Grito* mural during project construction with implementation of the recommended mitigation measures. Specifically, as discussed on pages 3.5-46 to 3.5-47, direct impacts related to vibration during construction activities will be mitigated to a less than significant level with implementation of Mitigation Measures VIB-A and VIB-B, relating to the use of vibration monitoring equipment and force adjustable ground compaction devices. Potential operational impacts to the mural would be less than significant as the physical integrity of the mural would remain intact and the mural would remain highly visible and would continue to convey its individual significance as an exceptionally important mural of high artistic value.

Refer to page 3.5-53 of Section 3.05, Cultural Resources, of the Draft EIR, for discussion of how the proposed Project would not directly impact the Los Angeles Terminal Annex Post Office. Indirect impacts may include the introduction of new visual features to the setting of the historical resource; however, these changes would not constitute a significant impact due to the setting's existing modern surroundings and substantial setback from both Alameda Street and the proposed Project.

Refer to pages 3.5-47 to 3.5.48 and 3.5-53 to 3.5-54 of Section 3.5, Cultural Resources, of the Draft EIR, for discussion of how the proposed Alameda Tower, Alpine Tower, and Chinatown/State Historic Park Station will not significantly impact historical resources in the vicinity of the proposed Project's alignment near Chinatown and Mission Junction, which include Philippe the Original, the Granite Block Paving, and the Capital Milling Company. Specifically, as discussed on pages 3.5-47 to 3.5-48 and 3.5-53 to 3.5-54, due to the physical separation of the proposed Project components from the historical resources, there is no potential for direct impacts to historical resources in the vicinity of these components. While construction of proposed Project components would temporarily introduce visual and auditory elements to the setting of Philippe the Original and the Capitol Milling Company, these indirect impacts would only occur temporarily during the construction period and, therefore, would be less than significant. Operational impacts include the introduction of new visual features to the setting of the historical resources, however, as discussed on pages 3.5-53 and 3.5-54, these changes would not substantially alter the existing setting and the historical resources would continue to convey their individual significance and their character-defining features would remain intact. Therefore, the operational impacts of the Alameda Tower, Alpine Tower, and Alameda Station would be less than significant.

Refer to pages 3.5-48 and 3.5-54 to 3.5-55 of Section 3.05, Cultural Resources, of the Draft EIR, for discussion of how the proposed Broadway Junction will not significantly impact historical resources in the vicinity of the proposed Project's alignment near Solano Canyon. There are five historical resources in the vicinity of the proposed Broadway Junction: 1035 N. Broadway, St. Peter's Italian Catholic Church, Cathedral High School, 451 E. Savoy Street, and the Charles B. Wellman Residence. The construction and operation of proposed Broadway Junction will not directly impact these historical resources as it is located a substantial distance from the historical resources in its vicinity. Indirect construction impacts would occur during only the 19-month construction period and therefore would be less than significant. While the proposed Broadway Junction would introduce new visual features to the setting of historical resources nearby, due to the existing setting, these changes would not constitute a significant impact. The historical resources would continue to convey their individual significance and their existing physical integrity and character-defining features would remain intact. Therefore, indirect operational impacts would be less than significant.

Refer to pages 3.5-48 to 3.5-49 and 3.5-56 to 3.5-57 of Section 3.05, Cultural Resources, of the Draft EIR, for discussion of how the proposed Stadium Tower and Dodger Stadium Station would not significantly impact historical resources in the vicinity of the proposed Project's alignment near Elysian Park. Construction and operation of the proposed Dodger Stadium Station will not directly or indirectly impact historical resources because there are none in the vicinity of the proposed station or construction staging area. Therefore, no impact would occur. The only historical resource in the vicinity of the proposed Stadium Tower is the Arroyo Seco Parkway Historic District. There is no potential for direct impacts to this historical resource due to the physical separation of the components of the proposed Project from the subject property. Construction would temporarily introduce visual elements to the setting of the Arroyo Seco Parkway Historic District. However, this indirect impact would occur during only the 12-month construction period and would cease after construction of the proposed Stadium Tower, and therefore, would be less than significant. Indirect operational impacts would include the introduction of new visual features to the setting of the Arroyo Seco Parkway Historic District. However, the change would not constitute a significant impact on the historical resource as the setting of the historic district overall has been altered over time by numerous improvements to SR-110, as well as adjacent new construction. The Arroyo Seco Parkway Historic District would continue to convey its significance and its existing physical integrity and character-defining features would remain intact. Therefore, the operational impact of the proposed Stadium Tower would be less than significant.

Comment GO13-9 The DEIR minimizes the Project's significant impact to the Los Angeles Union Station Passenger Terminal and Grounds, a cultural resource listed by the federal National Historic Preservation Act of 1966 and the California Register of Historical Resources. Built in 1939, Los Angeles Union Station is an architectural gem, utilizing a unique combination of Spanish Colonial Revival and Art Deco styles. Passengers, commuters, and tourists are welcomed with lush courtyards laden with orange trees, fan palms, and espalier magnolias. The DEIR describes the Project's proposed Alameda Station as "a concrete structure and platform with a barrel-arched canopy made of custom-perforated metal." The Project station would be over 75 feet above street grade, with a platform of over 30 feet above street grade. The DEIR further states: "The proposed Alameda Station would become a dominant visual feature of Alameda Street due to its size, design, and location elevated over the street. The proposed Alameda Station would be a highly visible change to the overall setting of the Los Angeles Union Station Passenger Terminal and Grounds property, which is designated for both its architectural and historical significance." Despite the assertions recognizing the visibly dominating impacts the enormous new proposed Alameda Station will have on the Los Angeles Union Station Passenger Terminal and Grounds, the DEIR inconsistently found the Project to have a less than significant impact.

We look forward to the EIR containing a thorough and accurate analysis of the Project's impacts not only on Los Angeles Union Station Passenger Terminal and Grounds, but also to the other cultural resources identified throughout the DEIR.

Response GO13-9 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. While the proposed Project's Alameda Station would be a visible change to the overall setting of the historical resource, as discussed on page 16 of Appendix G, integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area (i.e., addition of the proposed Project) should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property. As discussed on pages 3.5-49 and 3.5-50 of Section 3.05, Cultural Resources, of the Draft EIR, the Los Angeles Union Station Passenger Terminal and Grounds is designated for its architectural and historical significance, and the changes to the resource's setting resulting from the addition of Alameda Station would not impact its architectural significance or its ability to convey this significance. Specifically, as indicated on page 3.5-44, construction impacts will not alter the physical integrity or character-defining features of the historical resource. Also, as indicated on page 3.5-49, operational features that will have a direct impact on the property (e.g., the vertical circulation elements) will not alter the physical integrity or character-defining features of the historical resource. Further, visual alterations to the overall setting of the property will be insignificant due to prior substantial alterations to the existing setting and will not impact the significance of the historical resource nor its ability to convey its significance. Overall, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant.

Comment GO13-10 II. The DEIR's project description may be incomplete and may not fully analyze reasonably foreseeable activities as required by CEQA.

CEQA requires that a project be described with enough particularity that its impacts can be assessed.[9] The relevant standard for ascertaining what constellation of activities should be deemed to be a part of the "whole of an action" of a Project is whether such activities comprise "a group of interrelated actions" that are "part of a single, coordinated endeavor."[10] We are concerned that the DEIR may lack enough information to examine and evaluate the Project fully, effectively analyzing the project in a vacuum rather than including related and necessary operations, and omitting certain of the Project's foreseeable impacts.

Footnote 9: County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192.

Footnote 10: Association for a Cleaner Environment v. Yosemite Community College Dist. (2004) 116 Cal.App.4th 629, 636.

Response GO13-10 The proposed Project is described consistently throughout the entire Draft EIR based upon the Project Description provided in Section 2.0, Project Description, of the Draft EIR, clearly identifying the proposed Project's potential environmental impacts in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Accordingly, the Draft EIR analyzes the whole of this action, as well as reasonably foreseeable potential environmental impacts resulting from this action. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO13-11 A. The DEIR may be lacking critically important details in its project description.

Despite our understanding that documents exist associating the Project with foreseeable commercial and residential growth at the 260-acre McCourt Global property, the DEIR omits any mention of near-future commercial activity or development plans at Dodger Stadium. CEQA prohibits a project proponent from seeking approval of a large project in smaller pieces in order to take advantage of environmental exemptions or lesser CEQA review for smaller projects.[11] California courts have repeatedly held that "an accurate, stable and finite project description is the sine qua non of an informative and legally sufficient [CEQA document]."[12] Absent a complete project description, courts view the environmental analysis under CEQA as impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.[13]

California courts have articulated "general principles" for determining whether two actions are one CEQA project, including "how closely related the acts are to the

overall objective of the project," and how closely related they are in time, physical location, and the entity undertaking the action.[14] The appropriate inquiry is whether two projects are related to one another, i.e. they comprise the "whole of an action" or "coordinated endeavor."[15]

Courts have found improper piecemealing when the purpose of the reviewed project is to be the first step toward future development."[16] It is both logical and reasonable to infer that the Project is soon likely to be associated with development activity given the facts surrounding Dodger Stadium and the practical effects of the Project. For example, there are 81 home games in a regular baseball season, with up to 12 post-season games. The City of Los Angeles's Conditional Use Permit for Dodger Stadium allows a maximum of four special events per month. Even assuming additional special events, the Project is likely to be used at capacity no more than one hundred fifty days of the year. Accordingly, developing the area surrounding the Dodger Stadium Tower for entertainment, retail, and other commercial activities is a reasonable conclusion that could provide a practical basis and explanation for carrying out the Project. We recommend that the EIR be revised to consider the entirety of the Project, including all reasonably foreseeable phases, consistent with CEQA.

Footnote 11: Arviv Enterprises, Inc. v. South Valley Area Planning Com., (2002) 101 Cal.App.4th 1337, 1340.

Footnote 12: County of Inyo, supra, 71 Cal.App.3d 185, 193.

Footnote 13: Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376.

Footnote 14: Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214, 1226-1227.

Footnote 15: Id.

Footnote 16: Laurel Heights Improvement Assn., supra, 47 Cal.3d 376; Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263; City of Antioch v. City Council (1986) 187 Cal.App.3d 1325.

Response GO13-11 Refer to Response GO13-10 for a discussion of the Project Description's adequacy. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Further, the proposed Project addresses the need for a permanent transit connection to Dodger Stadium for Dodger games and special events at the Dodger Stadium property. Refer to Section 2.1,

Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO13-12 B. The DEIR should include an analysis of induced growth.

Section 15125.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of a proposed project.

When evaluating the potential environmental impact of a project that has growth inducing effects, an agency is not excused from environmental review simply because it is unclear what future developments may take place; it must evaluate and consider the environmental effects of the "most probable development patterns."[17] In fact, even if there is uncertainty as to the precise form of development that would eventually occur, a Project is not insulated from CEQA.[18]

Footnote 17: Aptos Council v. Cnty. of Santa Cruz (2017) 10 Cal.App.5th 266,

Footnote 18: Antioch, supra, 137 Cal.App.3d 1325, 1337.

Response GO13-12 Refer to Section 5.4, Growth-Inducing Impacts, of Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of the potential growth-inducing impacts of the proposed Project as required by Public Resources Code section 21100(b)(5). The Draft EIR's growth inducing analysis considered the potential growth-inducing impacts from the proposed Project in pages 5-57 through 5-60 of the Draft EIR, concluding that construction and operation of the proposed Project would result in less than-significant growth-inducing impacts, with respect to whether the proposed Project would foster population or employment growth, or the construction of additional housing, either directly or indirectly, on both a regional and

local scale. As discussed in Section 5.4, the proposed Project does not remove obstacles to growth but instead would increase connectivity in the densely urbanized downtown Los Angeles and provide direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. The Project Study Area includes a population of which approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. As discussed in Section 2.0, Project Description, Dodger Stadium is one of the region's most visited venues; however, there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets, throughout the surrounding communities, and on the nearby freeways. As the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. When complete, the travel time from LAUS to Dodger Stadium would be approximately 7 minutes during peak operations (games/events at Dodger Stadium). Approximately 20 percent of visitors could take aerial transit connected to Metro's regional transit system. By creating a high-quality and high-capacity rapid transit connection between LAUS and Dodger Stadium, the proposed Project would provide a more viable choice in making a trip to a Dodger game or event at the stadium. Further, given that the area in the City where the proposed Project alignment is located is densely urbanized and there are existing planned developments for the area, the proposed Project would be a benefit for existing and planned uses in the area.

Comment GO13-13 It is not our position that the DEIR must analyze with significant detail every conceivable development scenario; however, the DEIR needs to analyze the impacts in relation to the most probable development patterns. Publicly available resources have revealed the possibility of future development at the site of the Project. For example, information from the Los Angeles County Recorder's Office details possible future developments at Dodger Stadium that "may include, but are not limited to (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining, and entertainment facilities.[19] Further, the company that owns fifty percent of the parking lot at Dodger Stadium publicized its ownership interest in the 260-acre Dodger Stadium land as a "current real estate project."[20] Even without the aforementioned documents evidencing potential development at Dodger Stadium, the DEIR should account for the foreseeable and probable growth inducing development impacts of the Project.

The EIR should examine ways in which the proposed Project could foster economic growth, either directly or indirectly, in the surrounding environment.

Footnote 19: "Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine," Section 14.3, Los Angeles County Recorder's Office, Document #20120642991.

Footnote 20: "Our Company," McCourt Globaweb.archive.org/web/20210724150915/https://www.mccourt.com/mccourt-global-overview. Accessed via The Wayback Machine.

Response GO13-13 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Mere statements on a website are not evidence that such development is currently proposed, nor are they sufficiently firm or committed to such that environmental analysis is required. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. In addition, refer to Topical Response G for a discussion of how the proposed Project addresses the need for a permanent transit connection to Dodger Stadium for Dodger games and special events at the Dodger Stadium property, and how the Dodger Stadium property is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated by commenters. Further, the adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. Refer to Response GO13-12 for discussion of how the Draft EIR adequately analyzes potential growth in the Project Study Area.

Comment GO13-14 III. Conclusion

We have concerns as to whether the DEIR is adequately disclosing, analyzing, and mitigating the Project's environmental impacts. CEQA requires that Metro's review adequately identify and analyze the Project's foreseeable direct, indirect, and cumulative impacts. Thank you for your consideration in this matter. We look forward to reviewing your responses to our comments.

Respectfully submitted,

Paulina Torres
Staff Attorney
Natural Resources Defense Council

Damon Nagami
Senior Attorney
Natural Resources Defense Council

Response GO13-14 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO13-2 through GO13-13.

Comment Letter GO14 – LA Parks Alliance, John Given

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO14

Comment GO14-1 This letter is submitted on behalf of LA Parks Alliance[1] with respect to the above-captioned Los Angeles Aerial Rapid Transit Project (the "Project") in response to the release of the Project's Draft Environmental Impact Report ("Draft EIR" or "DEIR").

Footnote 1: LA Parks Alliance was formed in 2019 as a response to land use threats to LA State Historic Park. Its members are park and public space advocates. See https://www.laparksalliance.org.

Response GO14-1 This comment provides a general introduction to this letter. Responses to the comments contained in this letter are provided below in Responses GO14-2 through GO14-175.

Comment GO14-2 As an initial matter, please provide me with notice of all hearings, votes, or determinations related to the proposed Project, including timely provision of notices required pursuant to Public Resources Code 21167(f).

Response GO14-2 Metro has and will continue to comply with CEQA. The commenter will be included on the list of notices required pursuant to CEQA.

Comment GO14-3 Note that LA Parks Alliance adopts and incorporates by reference all DEIR comments and objections raised by others during the environmental review process. (See Pub. Res. Code, § 21177.)

Response GO14-3 Refer to Section 6.0, Responses to Comments, of this Final EIR, for responses to all comments received on the Draft EIR.

Comment GO14-4 As explained below in detail, the Draft EIR is deficient in many respects. It is incomplete, inaccurate, misleading, and largely supported by assumptions rather than substantial evidence. Among its more serious deficiencies, some of them fatal to its use as the proposed Project's environmental document, the DEIR misidentifies Metro as the Lead Agency, misidentifies the Project as public transportation, misidentifies the Project as eligible for SB 44, fails to identify and seek review by all required responsible and trustee agencies, assumes the Project may use state parkland for a significant part of its proposed alignment, and engages in piecemealing by ignoring reasonably foreseeable indirect physical changes in the environment due to the Project. In addition, evidence exists that an endangered species may be adversely affected, and Project approval would raise considerable concerns regarding gentrification and environmental justice.

Response GO14-4 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO14-5 through GO14-175.

Comment GO14-5 At the very least, the DEIR must be revised and recirculated after its many deficiencies have been corrected. In the alternative, Metro should seriously consider terminating review of the Project at the outset since it plainly cannot be constructed as currently proposed.

Response GO14-5 This comment and the comments in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. Refer to responses to the comments contained in this letter provided in Responses GO14-6 through GO14-175. Pursuant to CEQA, the purpose of the EIR is to provide sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO14-6 I. GENERAL COMMENTS

A. Arts District Community Council LA Letter of February 26, 2021

Following close of the Notice of Preparation / Project Scoping for the Project, on February 26, 2021, my office submitted a letter on behalf of Arts District Community Council LA ("ADCCLA") objecting to Metro's inadequate Notice of Preparation ("NOP") issued on or about October 1, 2020. LA Parks Alliance adopts the letter as reflecting its own position on the inadequate NOP, and requests that the DEIR respond to the allegations in that letter as if fully set forth herein.[2] The following summarizes the February 26, 2021, letter comments and objections.

Footnote 2: The February 26, 2021, letter is attached as Exhibit A. Note that while it was submitted following the close of the formal scoping process, Metro was required to consider the comments in preparation for the Draft EIR and it is already part of the administrative record of the case. (Pub. Res. Code, § 21082.1(b).)

Response GO14-6 Metro has considered the items raised in the referenced letter. Refer to Response GO14-7 for discussion of how the NOP for the proposed Project complied with CEQA. Refer to Response GO14-10 for a discussion of how the proposed Project solely consists of an aerial rapid transit system from LAUS to Dodger Stadium. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community

engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Pursuant to the CEQA Guidelines, lead agencies should use a public scoping process to help define the appropriate range of issues, and the depth and breadth of the analysis to be addressed in the environmental document. As discussed in Appendix A and Section 1.0, Introduction, to the Draft EIR, the Draft EIR considered and addressed topics from public comments and questions that were received during the NOP comment period, and at the scoping meetings, related to environmental issues.

Comment GO14-7 The October 1, 2020, Notice of Preparation for the Project is legally inadequate. The appropriate remedy is a revised Notice of Preparation and recirculation with a new review and comment period for responsive and trustee agencies and members of the public. Title 14 of the California Code of Regulations (hereafter "CEQA Guidelines") requires that an NOP "shall provide the responsible and trustee agencies, the Office of Planning and Research and county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response." (CEQA Guidelines, § 15082(a)(1) (emphasis added).)

The October 1, 2020, NOP is inadequate because it fails to provide sufficient information about the probable environmental effects of the project for responsible agencies to meaningfully respond, and indeed misleads these agencies through use of vague and otherwise inaccurate descriptions of the project. For example, the NOP suggests that there may be no direct impact on LA State Historic Park by describing a direct flyover of the park by the preferred project alternatives as being "in connection with providing additional transit service adjacent to the Los Angeles State Historic Park." (NOP, p. 2.) A reasonable interpretation by an uninformed reader of the NOP text could include that if an adjacent station is not constructed that the aerial tram would not fly directly over the park. As the February 2021 letter notes, even if the proposed Project did not encroach on and over LA State Historic Park, its development adjacent to the park would still have significant adverse impacts on the Park.

Response GO14-7 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The proposed Project's NOP complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. The NOP fully complied with Section 15082(1)(a), and provided an adequate project description, the project location (including a map of the routes as well as a narrative description), and probable environmental effects. Contrary to what this comment suggests, CEQA does not require an analysis of the probable environmental effects for the proposed Project in the Notice of Preparation, as that is the role of a Draft EIR. The NOP appropriately identified the environmental areas that would be studied in further detail in the Draft EIR. Further, sufficient

information was provided in the NOP to guide the responsible agency consultation process, as the NOP provided a written project description detailing the components of the proposed aerial gondola system, the proposed route, project location and environmental setting, as well as the overall project purpose. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the Metro's consultation with CEQA responsible agencies following the release of the NOP. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process.

Comment GO14-8 The NOP is also inadequate in that it fails to include a summary of the "[p]robable environmental effects of the project." (CEQA Guidelines, § 15082(a)(1)(C).) Instead, it lists the entirety of the CEQA Guidelines Appendix G analysis categories, explaining that the Draft EIR to follow will address all of them. While that may be factually accurate, the mere listing of analysis categories to be included in a later environmental review document cannot be understood as a description of "probable environmental effects," and does not serve to provide responsible agencies with sufficient information to make a meaningful response with respect to the scope of environmental review required. If only generalized information is provided to responsible agencies, only generalized responses will be received from them, which is insufficient to fulfill those agencies' mandatory NOP response obligations. (See CEQA Guidelines, § 15082(b)(3): "A generalized list of concerns not related to the specific project shall not meet the requirements of this section.")

Response GO14-8 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO14-7 for discussion of how the NOP for the proposed Project complied with CEQA.

Comment GO14-9 Under CEQA, a "project" is "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (CEQA Guidelines, § 15378(a) (emphasis added)). Where multiple "activities are part of a coordinated endeavor, among the various steps which taken together obtain an objective, or otherwise related to each other, they constitute a single project for purposes of CEQA." (County of Ventura v. City of Moorpark (2018) 24 Cal.App.5th 377, 385 [internal quotation marks and citations omitted].) "CEQA 'cannot be avoided by chopping up proposed projects into bite-size pieces' which, when taken individually, may have no significant adverse effect on the environment. [Citations.]" (Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214, 1223.) This improper practice is commonly referred to as "piecemealing."

Response GO14-9 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Because the comment does not address an environmental

issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO14-10 The NOP is therefore also inadequate for its incomplete and misleading project description, which must include the readily foreseeable future development at the Dodger Stadium terminus of the Project, where development of some portion of the 260 acres around Dodger Stadium owned or controlled in part by McCourt Global (also owner of the gondola development company ARTT LLC) is plainly foreseeable. McCourt Global's website included the following statements (published even after the NOP was released):

- "Our current real estate projects include…260 acres of land at Chavez Ravine in Los Angeles."
- "McCourt currently owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. Among other plans for the area, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies."[3]

Footnote 3: McCourt Global, McCourt / Our Company, last viewed / downloaded May 18, 2021, attached as part of Exhibit B (emphasis added); and McCourt Global, Real Estate Overview, Nov. 26, 2020, last viewed / screen captured Jan. 12, 2022 via "Internet Archive Wayback Machine" (https://web.archive.org), attached as part of Exhibit B (emphasis added), available at:

https://web.archive.org/web/20201126121740/https://www.mccourt.com/real-estate-overview.

But see McCourt Global, McCourt Partners Real Estate, attached as Exhibit C, available at: https://www.mccourt.com/real-estate, last viewed / screen captured Jan. 12, 2022 (scrubbing references to "real estate projects" and "other plans for the area" around Dodger Stadium except the LA ART project. See also lengthy discussion re Dodger Stadium "piecemealing," infra pp. 26-33.

Response GO14-10 This response considers the content of Exhibits B and C to this letter, referenced in this comment. Refer to Response GO14-7 for discussion of how the NOP for the proposed Project complied with CEQA. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Mere statements on a website are not evidence that such development is currently proposed, or are sufficiently firm or committed to such that environmental analysis is required. CEQA does not require such speculation. No

improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project.

Comment GO14-11 The failure to include any information in the NOP about this clearly foreseeable development associated with the proposed Project precluded responsible agencies and members of the public from providing meaningful responses on the "whole of the project." This comment is expanded upon at length below, as the Draft EIR suffers from the same fatal flaw.

Response GO14-11 Refer to Response GO14-10 for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Response GO14-7 for discussion of how the NOP for the proposed Project complied with CEQA. Agencies and members of the public were not precluded from providing meaningful comments on the NOP or the Draft EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during the scoping period led directly to changes to the proposed Project to incorporate public feedback.

Comment GO14-12 The February 2021 letter also criticizes the description of project alternatives, which then included only the so-called Spring Street alternative, the Broadway alternative, and the no-project alternative. The letter concludes by noting that the inadequate NOP frustrated members of the public, including members of ADCCLA. Its inadequacies interfered with their ability to provide informed comment to the lead agency, and ADCCLA requested that a revised, legally sufficient NOP be recirculated and a new comment period provided.

Response GO14-12 Refer to Response GO14-7 for a discussion of how the NOP for the proposed Project complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. CEQA does not require a full and complete accounting of potential Project alternatives in the NOP as this comment suggests. Indeed, the NOP process is intended to allow stakeholders and members of the public to provide comments on the scope and contents of the EIR, including any potential alternatives they wish to see analyzed. Agencies and members of the public were not precluded from providing meaningful comments on the NOP

or Draft EIR. Refer to Response GO14-11 for a discussion of the discussion of the proposed Project's public outreach during the NOP scoping period.

Comment GO14-13 Subsequently, ADCCLA, through LA Parks Alliance's letter of December 19, 2022, asserts that Metro was improperly designated as the lead agency under CEQA, and no longer requests that Metro revise and recirculate a legally adequate NOP. Instead, because Metro cannot be designated as the lead agency pursuant to CEQA Guidelines Section 15051, both ADCCLA and LA Parks Alliance request that Metro refrain from further environmental review of the Project and instead allow the properly designated CEQA lead agency, the City of Los Angeles, to begin the environmental process anew.[4]

Footnote 4: See John P. Given, letter to Metro Deputy Executive Officer Corey Zelmer ("Objection to Metro as Lead Agency"), Dec. 19, 2022, already a part of the Project record as a comment to the DEIR, and available at https://www.laparksalliance.org/2022/12/21/objection-to-metro-as-lead-agency/.

Response GO14-13 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro has discretionary authority to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project (Public Utilities Code § 130252), which will include several discretionary approvals (multiple approvals of design and construction plans, approvals and agreements contemplated in the Memorandum of Agreement and subsequent amendments, agreement to integrate fares with Metro's fares / one tap system). This discretionary authority is considerably more broad than the individual land use and other review and approvals to be issued by responsible agencies for the components of the proposed Project occurring within their jurisdiction. In short, Metro has "the greatest responsibility for supervising or approving the project as a whole" and is the appropriate lead agency. (CEQA Guidelines, §15051(b) [emphasis added].) Simply because other agencies have approval authority for the proposed Project, does not mean that Metro does not have the "principal responsibility" for approving or supervising the proposed Project. Indeed, CEQA recognizes that multiple agencies may have authority over a project. Therefore, CEQA includes the responsible agency process and consultation requirements in order for other agencies to provide necessary review and approval of aspects of a project. (Pub. Resources Code, §§ 21067, 21069.) The proposed Project would require review and approvals from Caltrans, State Parks, the City, and Cal/OSHA, as responsible agencies, in addition to review and approval by Metro as lead agency. Responsible agencies' discretionary approvals required for the proposed Project are secondary to Metro's statutory authority to review and approve transportation projects, and the City and other agencies were appropriately named

as responsible agencies. Further, Metro engaged in required consultation with all responsible agencies during the process of preparing the Draft EIR for the proposed Project, in compliance with CEQA. This consultation process included meetings with Metro and the responsible agencies to discuss the scope and content of the environmental information that Metro would include in the Draft EIR (Pub. Resources Code, § 21080.4(b); CEQA Guidelines § 15104), additional consultation with the City and State Parks as Draft EIR preparers, and comments from these responsible agencies on the Draft EIR (Pub. Resources Code, § 21153(c); CEQA Guidelines, § 15086(c).) This consultation process will continue throughout the course of the environmental review process. Consultation helps ensure that the EIR includes the necessary analysis regarding environmental effects within a responsible agency's jurisdiction to allow that agency to rely on the EIR, if ultimately certified, when considering the necessary approvals for the proposed Project that fall under its regulatory authority. As set forth in Section 2.0, Project Description, of the Draft EIR, if Metro certifies the Final EIR, each responsible agency will then conduct its own discretionary review process for the Project approvals it is responsible for. This comment references a letter from John P. Given to Metro Deputy Executive Officer Corey Zelmer ("Objection to Metro as Lead Agency"), Dec. 19, 2022. Refer to Responses GO8-1 through GO8-22 for responses to that letter.

Comment GO14-14 B. Metro Ignored Mandatory Project Review by Responsible and/or Trustee Agencies.

The "State Clearinghouse" is responsible for managing CEQA review for state agencies. (CEQA Guidelines, § 15205.) The lead agency has a mandatory duty to provide sufficient copies of an EIR to the State Clearinghouse so it may distribute them for agency review and comment for all agencies that are either "a responsible agency, trustee agency, or otherwise [have] jurisdiction by law with respect to the project" or when the project is identified "as being of statewide, regional, or areawide significance." (Ibid., subd. (b)(2)-(3).)

The Project fits both requirements. Review is required by many state agencies, including several trustee agencies. The Project is also one of "statewide, regional, or areawide significance" under CEQA Guidelines Section 15206 as the Project is within and would substantially impact the Santa Monica Mountains Zone as defined in the Public Resources Code, which includes virtually the entire Project area. (See CEQA Guidelines, § 15206, subd. (b)(4).) Public Resources Code Section 33105 states, in relevant part (emphasis added):

Response GO14-14 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Consistent with the requirements of CEQA Guidelines section 15205(b)(2)-b(3), prior to the release of the Draft EIR, Metro submitted the required documentation of the release of the Draft EIR to the State Clearinghouse (SCH # 2020100007). Documentation of submittal of the Draft EIR to the State

Clearinghouse is available on the SB 44 website for the proposed Project.[9] Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the Metro's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Refer to Response G014-16 for discussion of Metro's consultation with CEQA trustee agencies.

Comment GO14-15 The [Santa Monica Mountains Zone] shall also include Elysian Park and El Pueblo de Los Angeles State Historic Park and, for purposes of providing a recreational trail corridor, it shall also include hiking and equestrian trail connections and accessways between Griffith Park, Elysian Park, and El Pueblo de Los Angeles State Historic Park.

The entire Santa Monica Mountains Zone also falls within the state-designated Rim of the Valley Trail Corridor, for which a Master Plan was adopted in June 1990. (See Pub. Res. Code, §§ 33105.5, 33204.3 et seq.) The Rim of the Valley Corridor, including the entirety of the Santa Monica Mountains Zone, has been proposed to be added as a boundary adjustment to an expansion of the National Park Service's Santa Monica Mountains Recreation Area.[5]

Among the documents provided to the public by Metro when it released the Project's Draft EIR are a "Notice of Completion & Environmental Document Transmittal" and "Summary Form for Electronic Document Submittal."[6] The Notice of Completion lists a "Reviewing Agencies Checklist" to allow the lead agency to request the State Clearinghouse to distribute the Notice and Draft EIR documents to reviewing agencies so that those agencies can fulfill their CEQA comment obligations. (Notice of Completion, p. 2.) The Summary Form similarly allows the lead agency to provide a list of responsible or trustee agencies to the State Clearinghouse. (Summary Form, p. 2.)

Footnote 5: See Exhibit D, which includes: Santa Monica Mountains Conservancy (SMMC), Rim of the Valley Trail Corridor Boundary map and excerpts from Rim of the Valley Trail Corridor Master Plan; National Park Service, Rim of the Valley Unit Proposed Addition to Santa Monica Mountains National Recreation Area. SMMC's entire ROV Master Plan is available at:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwi1_YmO88z8AhWjKkQIHUZLCPEQFnoECAYQAQ&url=https%3A%2F%2Fsmmc.ca.gov%2Fwpcontent%2Fuploads%2F2020%2F04%2FROV-Master-Plan.pdf&usg=AOvVaw0pYr2L5XdpzX_kj982-GC6.)

Footnote 6: As of December 21, 2022 the documents seem to no longer be available at Metro's web page for the Project (https://www.metro.net/projects/aerial-rapid-

[9] Refer to Remainder of the Record category at https://laartsb44.net/#!/documents.

transit/) or in the related Dropbox file link found on that page for the DEIR and other documents. They should be a part of the Project record, but are attached as part of Exhibit E.

Response GO14-15 This comment provides a general recitation and characterization of the CEQA statute and regulations. This response considers the content of Exhibit D to this letter, referenced in this comment. Refer to Response G014-16 for discussion of consultation with CEQA trustee agencies, including Santa Monica Mountains Conservancy. All documents for the SB 44 administrative record for the proposed Project, including State Clearinghouse Documents filed at the time the Draft EIR was released, are available on the proposed Project's SB 44 website.[10] In response to comments regarding the Rim of the Valley Trail Corridor, an addition to the Draft EIR has been provided for the Rim of the Valley Trail Corridor Master Plan. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of the Rim of the Valley Trail Corridor Master Plan. As noted therein, while the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate I-5. The proposed Project would provide access to and connectivity between El Pueblo, Los Angeles State Historic Park, and Elysian Park.

Comment GO14-16 Metro failed to include at least two state agencies that should have received notice and copies of the Draft EIR on the Notice of Completion form as required. The first, the Santa Monica Mountains Conservancy ("SMMC"), is a designated trustee agency over resources within the Project area. (See Pub. Res. Code, § 33105, quoted above.)[7] It was not listed on either State Clearinghouse Form.[8]

The second state agency Metro failed to notify, the California Department of Housing and Community Development ("HCD"), has responsibilities which include ensuring every California city (whether a general law or charter city) assesses, analyses, and plans for "an inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need" for various income levels. (Cal. Gov. Code, § 65583, subd. (a)(3).) It was likewise not listed on either State Clearinghouse Form.

The Surplus Lands Act (Govt. Code sections 54220-54234) provides for a right of first refusal to other public agencies whenever a local agency proposes to dispose of surplus land. A notice of availability requirement is applicable to both the SMMC and the HCD. (Govt. Code, §§ 54222, 54230.5.) Sales and leases of surplus lands generally qualify as dispositions requiring approval of HCD before sale or lease of surplus land can be finalized. (Govt. Code, §54230.5, subd. (b)(1).)[9] Similarly, California law requires that the sale of any property by a public agency within the Santa Monica Mountains Zone requires offering the land to the SMMC first:

[10] Refer to Remainder of the Record category at https://laartsb44.net/#!/documents.

Footnote 7: See also, Supervising Deputy Attorney General Christina Bull Arndt, letter to Executive Director Joseph T. Edmiston, Santa Monica Mountains Conservancy, July 26, 2021, attached as Exhibit F. "The Conservancy meets the definition of a trustee agency because it is a state agency which has jurisdiction over the natural resources of the [Santa Monica Mountains] Zone, which it holds in trust for the people of California…[T]he Conservancy should be considered a trustee agency for any CEQA project which affects natural resources within the Zone." (Exhibit F, p. 3.)

Footnote 8: Curiously, the Notice of Completion lists a similar agency, the "California Baldwin Hills Conservancy (BHC)," as a reviewing agency for the Project even though at closest Baldwin Hills is approximately seven miles distant from, and has no resources near or within, the Project area. For more information, see http://bhc.ca.gov.

Footnote 9: See also, HCD's Surplus Lands Act FAQ, available at: https://www.hcd.ca.gov/docs/planning-andcommunity-development/slafaq.pdf.

Response GO14-16 This response considers the content of Exhibit F to this letter, referenced in this comment. Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the Metro's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with the City and State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Santa Monica Mountains Conservancy ("SMMC") has no discretionary approval authority related to the proposed Project; however, Metro notified SMMC as a trustee agency.[11] CEQA defines a "trustee agency" as "a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California." (Public Resources Code, § 21070.) Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of the Surplus Land Act. HCD is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. (Public Resources Code § 21069.) Refer to

[11] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

Section 2.10, Required Permits and Approvals, of the Draft EIR, which provides a list of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project.

Comment GO14-17 The conservancy shall have the first right of refusal on any property within the zone presently owned by a public agency and scheduled for disposal as excess lands, except where such lands are designated for acquisition as a park or recreation area by a federal, state, or local agency. The conservancy shall have the right to acquire such lands at the disposing agency's purchase price plus any administrative and management costs incurred by the disposing agency. (Pub. Res. Code, § 33207(b).)

The DEIR describes public lands within the City of Los Angeles as potential sites for several Project components. For example, "the proposed Alameda Tower, which would be constructed on the Alameda Triangle, a portion of City ROW between Alameda Street, North Main Street, and Alhambra Street." (DEIR, p. ES-4.) "The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on city-owned property." (Ibid.) "[T]he proposed Chinatown/State Park Station would be constructed partially on City ROW and partially within the boundaries of the Los Angeles State Historic Park." (Ibid.)

The City of Los Angeles maintains and periodically publishes a list of declared and undeclared surplus properties that can be reviewed by registering for and then downloading them from the Department of General Services website.[10] Review of recently downloaded declared and undeclared surplus properties lists discloses that none of the site described in the DEIR were listed as either declared or undeclared surplus properties when the DEIR was released.[11]

Before the City of Los Angeles may dispose of any of the lands described in the DEIR as city-owned, under the Surplus Lands Act it must notify both SMMC and HCD that the lands are surplus and follow the appropriate legal process before it may dispose of them for the benefit of a private project, including the LA-ART gondola Project. But Metro's State Clearinghouse submissions failed to identify SMMC and HCD as responsible agencies and failed to identify SMMC as a trustee agency. There is no indication that either agency has had any notice of the Project, let alone adequate notice.

Footnote 10: See https://gsd.lacity.org/services/integrated-asset-services/property.

Footnote 11: See "City of Los Angeles – Surplus Declared Properties as of (12/6/2022)" and "City of Los Angeles – Surplus Undeclared Properties as of (12/6/2022)" downloaded from the General Services website on December 20, 2022, attached as Exhibit G.

Response GO14-17 This comment provides a general recitation and characterization of California law, case law, and/or regulations, and the Draft EIR. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a

discussion of the Surplus Lands Act. Refer to Response GO14-16 for discussion of consultation with CEQA trustee agencies, including Santa Monica Mountains Conservancy and HCD. Documents for the SB 44 administrative record for the proposed Project, including State Clearinghouse Documents filed at the time the Draft EIR was released, are available on the proposed Project's SB 44 website.[12]

Comment GO14-18 LA Parks Alliance notes that it is highly unlikely that the proposed site for the Alpine Tower Project component, described as "currently being used as non-public parking storage for City vehicles" (DEIR, p. ES-8), would be available to the proposed Project given its highly suitable location for affordable housing. Affordable housing is particularly appropriate at sites near public transit. The parcel at the proposed Alpine Tower location is approximately 700 feet from Metro's Gold Line Chinatown station, less than half a mile from LA Union Station, and located between and at most only a few hundred feet from existing major bus route stops along Alameda Street. (See DEIR, Table 3.17-1 and Figure 3.17-2, pp. 3.17-13 to 3.17-16.)[12] If desired, bus stops could be added or re-located nearer to the parcel to be even more convenient for a future affordable housing project at the site.

There are numerous state incentives for housing opportunities near public transit. California's Density Bonus Law, for example, allows affordable housing projects to reduce or eliminate parking, providing a major cost benefit for affordable projects. (See generally, Govt. Code, §§ 65915-65918). HCD has an Affordable Housing and Sustainable Communities Program, which "funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas ("GHG") emissions."[13] The City of Los Angeles has its own Transit Oriented Communities Affordable Housing Incentive Program and Guidelines which in some respects exceeds the baseline requirements of the State Density Bonus Law. (See Los Angeles Municipal Code ("LAMC"), § 12.22 A.31.)

For the preferred alternative of the Project to proceed, it would almost certainly have to undergo a major design overhaul to relocate the Alpine Tower, as there is very little chance a tower could be constructed at the desired site given the site's suitability for a far more urgent need with legally superior right to the site than a private gondola project. Moreover, the environmentally superior alternative, the Transportation Systems Management Alternative, remains available, and with only modest modifications could easily achieve most Project goals, leaving the proposed Alpine Tower site for its more suitable use as affordable housing.

Footnote 12: As the County's regional transportation authority, Metro is particularly well suited to analyze the suitability of the site for affordable housing with respect to proximity of existing public transit options.

[12] Refer to Remainder of the Record category at https://laartsb44.net/#!/documents.

Footnote 13: For more information, see https://www.hcd.ca.gov/grants-and-funding/programs-active/affordablehousing-and-sustainable-communities.

Response GO14-18 This comment provides a general recitation and characterization of statutes and regulations. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing, including at the Alpine Tower's location, and how the Alpine Tower's location considered and avoided the anticipated 903 North Main Street Homeboy housing project. Furthermore, refer to Topical Response E for discussion of how development of housing is constrained on the portion of 901 North Main where the proposed Alpine Tower would be located due to the proximity to the Metro L Line (Gold) tracks. The proposed Alpine Tower would be located on a triangular portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets, and this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing. Compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment GO14-19 Metro's failure to provide notice to SMMC and HCD requires, at the least, an immediate extension of the comment period so that these agencies have sufficient time to study the Draft EIR with respect to Project concerns related to their respective jurisdictions. The DEIR is inadequate for its failure to identify the clearance required by HCD before any of the City public land identified by the DEIR may be transferred to a private party to construct or operate the Project. It is further inadequate for failing to identify the potentially significant land use conflicts under the Surplus Lands Act and Public Resources Code related to the public interest and resources identified in those statutes. The environmental review process cannot proceed until this serious procedural error has been fully remedied.

Response GO14-19 Refer to Responses GO14-16 through GO14-18 for a discussion of Metro's consultation with responsible and trustee agencies, including SMMC[13] and HCD, as

[13] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

well as the Surplus Land Act. Compliance with the Surplus Land Act, should it apply, is separate and distinct from the CEQA environmental process and the purpose of environmental review. Refer to Appendix A, Public Outreach Report, of this Final EIR, for an overview of the Draft EIR public review period. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. No further extension is required; as discussed in Response GO14-16, the required consultation and notice has occurred.

Comment GO14-20 C. The Project is Not a Public Transit Project Eligible for SB 44 Streamlining

As discussed briefly in an earlier DEIR comment letter, the Project is not a public transit project, as it is proposed to be privately owned and operated and intended primarily to provide service to and from Dodger Stadium, a private sports and event venue.[14] It is therefore not eligible for SB 44 streamlining as an environmental leadership transit project ("ELTP") as claimed in the DEIR. (DEIR, pp. 1-4 to 1-9.) The Draft EIR is therefore inaccurate and misleading and fails as an informational document for including these false claims. Moreover, since the Project is not eligible for SB 44, any attempt by Metro to limit the exercise of project objectors' rights under generally applicable law that does apply would violate CEQA's strict procedural mandates and likewise allow for objectors to seek an appropriate legal remedy.

Footnote 14: See Given letter, pp. 8-10, supra p. 4 fn. 4.

Response GO14-20 This comment provides a general recitation and characterization of CEQA, including SB 44. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to the Responses for GO8 responses to the referenced letter in the footnote to this comment. As provided in Appendix R, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Draft EIR, SB 44 establishes specified procedures for the administrative and judicial review of the environmental review and approvals granted for an environmental leadership transit project, including that actions or proceedings seeking judicial review of the certification of an environmental impact report for an environmental leadership transit project or the granting of any project approval, including any appeals to the court of appeal or the Supreme Court, to be resolved, to the extent feasible, within 365 calendar days of the filing of the certified record of proceedings with the court to an action or proceeding seeking judicial review of the lead agency's action related to an environmental leadership transit project. SB 44 accordingly does not abrogate CEQA's requirements, but imposes timing requirements to ensure an efficient judicial review process for both petitioners and the lead agency alike. Further, Metro has complied with and will continue to comply with all of CEQA's requirements.

Comment GO14-21 The mandatory requirements for SB 44 are found in Public Resources Code section 21168.6.9. An ELTP is a "project to construct a fixed guideway and related fixed facilities that meets all" of the conditions of subdivision (a)(1) of that statute. The first requirement is the project be a "fixed guideway operating at zero emissions." The ELTP statute uses the federal definition for "fixed guideway" found in Chapter 53 (Public Transportation) of the United States Code. (Pub. Res. Code, § 21168.6.9, subd. (a)(2), citing 49 U.S.C. § 5302.)

Under federal law, a "fixed guideway" is precisely defined as follows:

Fixed guideway.—The term "fixed guideway" means a public transportation facility—

(A) using and occupying a separate right-of-way for the exclusive use of public transportation;

(B) using rail;

(C) using a fixed catenary system;

(D) for a passenger ferry system; or

(E) for a bus rapid transit system.

(49 U.S.C. § 5302, subd. (8).)

The term "public transportation" used in the definition for "fixed guideway" is further defined as follows. "Public transportation:"

(A) means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and

(B) does not include—

(i) intercity passenger rail transportation provided by the entity described in chapter 243 (or a successor to such entity);

(ii) intercity bus service;

(iii) charter bus service;

(iv) school bus service;

(v) sightseeing service;

(vi) courtesy shuttle service for patrons of one or more specific establishments; or

(vii) intra-terminal or intra-facility shuttle services.

(49 U.S.C. § 5302, subd. (15).)

The proposed Project is not "public transportation" within the meaning of federal law.

Response GO14-21 This comment provides a general recitation and characterization of Senate Bill (SB) 44 and federal statutes. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of SB 44. As discussed in Topical Response A, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO14-22 First, the Project is not a "regular, continuing shared-ride surface transportation" service. It is not "regular" and "continuing." The Project is intended primarily to provide "a direct transit connection between LAUS and the Dodger Stadium property…" (DEIR, p. 2-12.) On non-game and non-event days, the Project would operate at the discretion of the operator, not on a regular schedule: "It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand." (DEIR, p. 2-42 (emphasis added).) Compare this demand-based operational decision-making to the continuing and regular Gold Line and local bus route schedules, which operate each day on a published schedule without respect to day-to-day demand.

Moreover, the Project's proposed use for other purposes, including travel to and from Dodger Stadium for use by community members in neighborhoods near Dodger Stadium are entirely speculative. See DEIR, p. ES-10: "The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger Stadium Station to include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon."

The decision to operate based on commercial demand rather than on a regular schedule, and speculative permissive use by a separate entity to allow operation on some days but not others mean the Project is not "regular" and "continuing" and therefore is not "public transportation" under applicable federal law.

Response GO14-22 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, while the proposed Project may "vary the number of cabins in service and speed throughout the day, based on demand," just as Metro trains and buses do, the proposed Project would operate under a pre-determined, regular operating hour schedule. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/ last mile multi-modal options, such as a bike share program and

individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment GO14-23 Second, the Project would not provide surface transportation at all, as it is an aerial tramway. It is designed and intended to carry its passengers above surface transportation, to entirely avoid vehicle traffic. Consideration of the project types that may be considered a "fixed guideway" is informative. (See 49 U.S.C. § 5302, subd. (8), which lists only rail, fixed catenary systems, passenger ferry systems, and bus rapid transit systems.) None are or include aerial, non-surface transportation, such as a gondola or aerial tram.

Response GO14-23 This comment provides a general recitation and characterization of the federal statutes. Refer to Topical Response A, SB 44, of the Final EIR, for discussion of how, as an aerial tramway, the proposed Project is a fixed guideway, consistent with FTA precedent.

Comment GO14-24 Third, on game and event days at Dodger Stadium, the Project would not be "open to the general public or open to a segment of the general public defined by age, disability, or low income." The Project would prioritize Dodger ticket holder (and presumably special event use) (DEIR, p. 3.17-25) and may entirely exclude the "general public" at those times. Such limitations show the Project is not "public transportation" as defined in section 5302 subdivision (A). In fact, such limitations cause the Project to be more accurately described as a "courtesy shuttle service for patrons of one or more specific establishments," which is specifically excluded from being considered "public transportation" under section 5302 subdivision (B).

Response GO14-24 This comment provides a general recitation and characterization of the federal statutes. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO14-25 The DEIR also describes the Project's use for tourism. "Tourism ridership would be driven by the proposed Project capturing a share of the existing tourism market in Los Angeles, particularly for tourists to downtown Los Angeles visiting other attractions." (DEIR, p. 3.17-25.) But "sightseeing" services for tourism are also specifically excluded from consideration as "public transportation" under relevant federal law. (49 U.S.C. § 5302, subd. (15)(B)(v).)

Response GO14-25 This comment provides a general recitation and characterization of the federal statutes. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project is not a sightseeing service. As discussed in Section 2.3.7, Purpose and Need, of the Draft

EIR, the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO14-26 The Project is not "public transportation."

Since the first requirement of a "fixed guideway" is that it be a "public transportation facility" the Project cannot be considered a "fixed guideway" and on that basis does not qualify for SB 44 ELTP streamlining. But even assuming the Project could be considered "public transportation," which plainly based on a textual analysis of the federal statute it cannot be, other section 5302 requirements are also not met.

Notwithstanding the DEIR's contrary conclusion, the project would not "us[e] and occupy[] a separate right-of-way for the exclusive use of public transportation." The DEIR claims, "the proposed Project would exclusively use and occupy the airspace above the public right-of-way through a franchise agreement with the City of Los Angeles" and "[f]or that reason, the proposed Project, as a type of aerial tramway, is properly classified as a "fixed guideway" as defined by SB 44." (DEIR, p. 1-5) This analysis is incomplete, inaccurate, and misleading.

The Project's surface components would be built primarily (but not exclusively) within an existing City right-of-way that is used primarily by surface vehicles (DEIR, p. ES-4). Only the aerial components of the Project would be constructed and operated above that right of way, but they would also not operate exclusively in that area. The Project would use other areas in addition to the City's right of way areas for its operation. It would also use airspace above private properties, above Los Angeles State Historic Park, above Metro's Gold Line, and above the SR-110 freeway. (ES-4 to ES-7.) It's queuing areas could also be expected to use surface area space dedicated to other purposes. (See, e.g., ES-8, describing queuing areas located "in a proposed new pedestrian plaza at El Pueblo…")

Response GO14-26 This comment provides a general recitation and characterization SB 44. Refer to Response GO14-22 for a discussion of the proposed Project is public transit. As discussed in Topical Response A, SB 44, the FTA considers aerial tramways fixed guideways for purposes of the definition in Section 5302. Federal law does not require use of exclusive rights-of-way for all components of a transit service. The proposed Project would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Federal law does not prohibit aerial tramways from acquiring aerial rights for portions of the separate right of way for its use.

Comment GO14-27 And the Project proposes to use significant surface area of the Los Angeles State Historic Park. (DEIR, p. 3.11-38: "The Chinatown/State Park Station would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park.") It is evident from information included in the DEIR that the Project would not use and occupy a separate right-of-way for the exclusive use of public transportation, since it would also use spaces within several parks and other public and private spaces that are not reserved for the exclusive use of public transportation. Even the surface area of City rights-of-way where Project components would be built (and over which they would "overhang," as the DEIR describes it, see, e.g., DEIR, pp. 2-51 to 52), are not exclusively used for public transportation, as they are roadways open for ordinary vehicle traffic.

Response GO14-27 Refer to Response GO14-26 for a discussion of how the proposed Project would primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO14-28 The DEIR fails to provide a meaningful SB 44 analysis including the Project's anticipated use of the described ground and airspaces that are proposed to be used by the Project that are not reserved for the exclusive use of public transportation. The DEIR's conclusory statement about only one part of the Project that uses an aerial portion of the City right-of-way is in no way adequate to show it meets all of section 5302's requirements.

Response GO14-28 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Public Resources Code section 21168.6.9 does not require the EIR to include an assessment of the applicability of

SB 44 to the proposed Project. Nevertheless, Section 1.4.3, Senate Bill 44, of the Draft EIR, includes an assessment of the proposed Project's compliance with SB 44.

Comment GO14-29 To complete the analysis under section 5302, the Project is not a "rail" project. It does not use a "fixed catenary system."[15] It is not for a "passenger ferry system" or a "bus rapid transit system." (49 U.S.C. § 5302, subds. (8)(B)-(E).)

As the Project does not meet any of the basic requirements of relevant federal law to be considered a "fixed guideway facility" it is clearly not eligible for SB 44 streamlining status. This is, without more, sufficient to show that the Project is not eligible as an environmental leadership transit project under SB 44.[16]

Footnote 15: "[A] catenary is a system of overhead wires used to supply electricity to a locomotive, streetcar, or light rail vehicle which is equipped with a pantograph. The pantagraph [sic] presses against the underside of the lowest overhead wire, the contact wire." Southeastern Pennsylvania Transportation Authority (SEPTA), What is a Catenary?, July 13, 2017, https://iseptaphilly.com/blog/catenary . The Metro Gold Line is such a system. (DEIR, p. 5-61.)

Footnote 16: Notably, and as discussed in LA Parks Alliance's earlier letter, ARTT LLC has even argued that its Project is not a "transit guideway system." See Given letter, supra note 4, p. 8, fn. 9.

Response GO14-29 This comment provides a general recitation and characterization of federal statutes. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response GO8 for a response to the letter referenced in Footnote 16. As discussed in GO8-19, the comment cites a document predating the initiation of environmental review for the proposed Project, which accordingly has no bearing on the sufficiency of the Draft EIR. Further, for the proposed Project, Metro is tasked with approving all plans for design, construction, and implementation, as well as with providing the proposed Project written approvals to operate, pursuant to its authority under Public Utilities Code section 130252.

Comment GO14-30 But the requirement to be a "fixed guideway facility" is but one of SB 44's requirements. Among other things, the DEIR must also demonstrate that the Project "reduces emissions by no less than 50,000 metric tons of greenhouse gases directly in the corridor of the project defined in the applicable environmental document over the useful life of the project, without using offsets," "reduces no less than 30,000,000 vehicle miles traveled in the corridor of the project defined in the applicable environmental document over the useful life of the project," and that it is consistent with applicable planning and transportation strategies. (Pub. Res. Code, § 21168.6.9, subds. (1)(B)-(E).) The DEIR analysis of these additional requirements is likewise inadequate, inaccurate, and incomplete for the DEIR's failure to consider and analyze the readily foreseeable future development at the Dodger Stadium terminus of the

Project, a significant and fatal flaw which will be discussed further below.[17] Dodger Stadium development would draw passenger vehicles to the Project area that are not considered in any DEIR analysis category, and invalidate all conclusions with respect to reduction of greenhouse gas emissions, vehicle miles traveled, and consistency with applicable planning and transportation strategies.

Footnote 17: See also, comments re NOP, supra pp. 2-4.

Response GO14-30 This comment provides a general recitation and characterization of SB 44. Refer to Topical Response A, SB 44, of the Final EIR, for discussion of how, as an aerial tramway, the proposed Project is a fixed guideway, consistent with FTA precedent, and how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Further, refer to Section 1.0, Introduction, of the Draft EIR, pages 1-4 through 1-9, for analysis of the proposed Project's compliance with SB 44. As discussed therein, the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gases directly in the proposed Project's corridor as defined within the EIR over the useful life of the proposed Project, and, without using offsets, the proposed Project's lifetime VMT reduction over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under SB 44. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property..

Comment GO14-31 "Full compliance with the letter of CEQA is essential to the maintenance of its important public purpose. Reviewing courts have a duty to consider the legal sufficiency of the steps taken by [administrative] agencies [citation], and we must be satisfied that these agencies have fully complied with the procedural requirements of CEQA, since only in this way can the important public purposes of CEQA be protected from subversion." (Envtl. Prot. Info. Ctr. v. Johnson (1985) 170 Cal.App.3d 604, 622-623 (citations and internal quotation marks removed, emphasis added).) The Project is not eligible for SB 44 as an environmental leadership transit project. The environmental review process must therefore follow CEQA's generally applicable procedural mandates.

Response GO14-31 This comment provides a general recitation and characterization of the CEQA statue, case law, and regulations. Refer to Topical Response A, SB 44, and Responses GO14-20 to GO14-30, for discussion of the proposed Project's consistency with the

requirements of Senate Bill (SB) 44. Metro has complied with and will continue to comply with CEQA's requirements.

Comment GO14-32 D. No Part of Los Angeles State Historic Park is Available for Sale or Lease for Commercial Purposes; Proposed Entitlements from California Department of Parks and Recreations to Allow Use of the Park cannot be Granted.

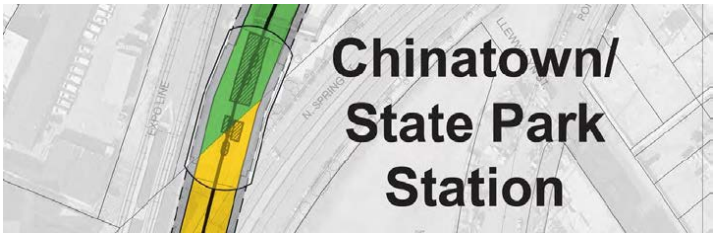
1. Proposed Use of Los Angeles State Historic Park.

The preferred Project alignment proposes the use of land and airspace at and above Los Angeles State Historic Park ("LASHP"). (DEIR, p. ES-4.) The DEIR describes the Project's Chinatown/State Park Station as "constructed partially on City ROW and partially within the boundaries of" LASHP, suggesting that the station is evenly shared between City land and the park. (Ibid.) The more accurate description for those who venture beyond the DEIR's executive summary, discloses that the station uses far more parkland than City ROW:

> The station would have a footprint of 2,605 square feet, comprised of 410 square feet located on City ROW and 2,195 square feet in the park. The station canopy would have an overhang of 15,030 square feet, comprised of 5,710 square feet over City ROW and 9,320 square feet over the park.

(DEIR, p. 2-52.)

More than 84 percent of the station's footprint is located within the LASHP boundary, and approximately 62 percent of the station's "overhang" is located above the park. The following image, taken from DEIR Appendix Q, p. 4, shows how the Project footprint and "overhang" of the Chinatown/State Park Station are predominantly within LASHP.



Response GO14-32 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework, including Public Resources Code section 5019.59, that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of

the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. Refer to Response GO14-33 for additional information about the Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO14-33 In addition, the DEIR states that "[t]he proposed Project's required aerial clearance width over the Los Angeles State Historic Park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, plus an Additional Separation Buffer." (DEIR, p. 2-52 (emphasis added).) While the "Additional Separation Buffer" is mentioned within the DEIR numerous times (e.g., ibid.), nowhere is it specifically defined. The discussion of American National Standards Institute (ANSI) Standard B77.1 (DEIR, pp. 2-18 to 2-19), clearly states that the 53 feet 2-inch width does not include the Additional Separation Buffer. Overhead images in the DEIR that show the Additional Separation Buffer likewise do not provide meaningful information about the area the buffer would occupy. (See, e.g., DEIR, Figure 2-7, p. 2-20; DEIR Appx. Q, p. 4.) The DEIR thus fails to provide the necessary information necessary to understand how much park area would be used by the Project.

Response GO14-33 Section 2.4.6, Aerial Clearance, of Section 2.0, Project Description, of the Draft EIR details that Industry standards for the design and operation of ropeways and cabins are documented in the American National Standards Institute (ANSI) Standard B77.1, which is developed in coordination with manufacturers, consumers, and regulators. ANSI B77.1 regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles, pedestrians, vegetation, buildings, and other structures. ANSI B77.1 provides minimum clearance requirements depending on the nature of the element and whether the clearance is vertical or horizontal. To define the width of the ropeway path which must be clear of elements, the horizontal clearance outside of the cabin paths as required by the ANSI B77.1 safety standard for passenger ropeways was used. ANSI B77.1 includes two criteria, both of which must be met, for horizontal clearance between the cabin and an adjacent element: when hanging vertically, the cabins must be no closer than five feet to any obstruction that is not part of the ropeway system; and when the cabins are tilted within a prescribed range (as from wind), the cabins must not come into contact with anything. For the proposed Project, the five-foot requirement is slightly wider than the swing requirement, so the five-foot requirement controls the design path width. The proposed Project would include five feet on each side of the vertically hanging

cabins for a required aerial clearance width of 53 feet 2 inches. The proposed Project would also include an Additional Separation Buffer. Figure 2-7 of Section 2.0, Project Description, depicts the proposed Project's anticipated aerial rights requirements and the Additional Separation Buffer. Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer, with additional detail provided in Appendix N, Additional Separation Buffer, of the Final EIR. Based on the current design, the Additional Separation Buffer is estimated to be approximately 10 feet on each side of the required aerial clearance width based applicable standards, requirements, building codes, and guidelines. The proposed Project's Additional Separation Buffer would comply with applicable standards, requirements, building codes, and guidelines as determined by the City and Metro. The final width of the Additional Separation Buffer would be determined by the appropriate agencies during the permitting process for the proposed Project. Refer to Response GO14-32 for discussion of how, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for kite flying, special events, and other passive recreational opportunities would not be affected by the proposed Project.

Comment GO14-34 The above measurements describe an area for the Project alignment, which is perhaps helpful to understand the Project when viewing it on an overhead plan view. But the Project is not flat. It will exist and operate within a 3-dimensional envelope. The DEIR fails to explain the total volume of space required by the Project to operate safely within LASHP, only noting that "[t]he aerial clearance would allow the continued use of the park, with certain limitations." (DEIR, p. 2-52.) The DEIR fails not only to provide the necessary information to understand the volume of space used by the Project, but also to explain the specific limitations that might be imposed upon LASHP visitors as they use the park as a result of construction of the Project.

Response GO14-34 Refer to Response S2-2 regarding the Chinatown/State Park Station and Response GO14-32 for discussion of how, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for kite flying, special events, and other passive recreational opportunities would not be affected by the proposed Project.

Comment GO14-35 The DEIR does explain that certain activities, such as kite flying, would not be possible in the vicinity of the Project, and that LASHP special event spaces would need to be altered to some degree from where they might otherwise be located to accommodate the Project. (DEIR, pp. 5-60 to 5-63.) But park uses in the vicinity of the Project area, and not solely beneath the area where gondolas would continuously cross through the park's airspace, would be profoundly and adversely impacted. The DEIR fails to describe the amount of parkland area at the western edge of LASHP that is cut off, "orphaned" from the rest of the park as a narrow remainder parcel sliver. It

appears to be at least several tens of thousands of additional square feet when viewed from overhead. (See DEIR, Appx. Q, p. 4.)

Response GO14-35 This comment provides a characterization of the Draft EIR. Refer to Section 5.0, Other CEQA Considerations, for discussion of how the ability to use the vast majority of the park for kite flying would not be affected by the proposed Project and how, due to the location of the proposed Project alignment on the western edge of the park adjacent to and crossing over the existing Metro L Line (Gold), a light-rail train with an overhead catenary system, and the western pedestrian walkway within the park which has existing trees along both the west and east side of the walkway, the proposed Project does not significantly reduce the safe kite flying area within the park. The proposed Project would not cut off or orphan the western edge of the park from the rest of the park. As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

Comment GO14-36 The DEIR describes approvals thought necessary from the California Department of Parks and Recreation on DEIR page 2-61:

Approvals determined necessary by the California Department of Parks and Recreation for the Project could include, but not necessarily be limited to:

a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.

b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.

c. Pursuant to Public Resources Code Section 5003 and Government Code Section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.

d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

As discussed in the following sections, these approvals cannot lawfully be made.

Response GO14-36 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO14-37 2. Legal framework

With "approval of the state agency concerned," Government Code section 14666 allows grant of an easement or right-of-way "across real property belong to the state…for those purposes as the [Director of General Services] deems are in the interest of the state." The state agency responsible for LA State Historic Park is our Department of Parks and Recreation ("DPR" or "Department"). (See Govt. Code, §§ 5001-5019.5.) DPR is the controlling authority for California state parks, which are "to be preserved and managed for the benefit and inspiration of all state residents and visitors to the state parks." (Pub. Res. Code, § 5001, subds. (a)(2), (b).) The DPR's Director "shall promote and regulate the use of the state park system in a manner that conserves the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations." (Pub. Res. Code, § 5001.2 (emphasis added).)

Similarly, the Department "shall administer, protect, develop, and interpret the property under its jurisdiction for the use and enjoyment of the public." (Pub. Res. Code, § 5003 (emphasis added).)

The DPR is "authorized to provide means of ingress and egress" to provide access to the public. (Pub. Res. Code, § 5003.5.) And the Department has done so: one ingress/egress location is conveniently located approximately 300 feet from Metro's L Line (Gold Line) Chinatown Station, there are several gates located along Spring St. that may be opened when access is desired, and there are two vehicle entrances/exits.

But the Department is expressly limited in allowing use of parkland to provide right-of-way access to other land. The mandatory inquiry requires the Department to consider whether the land to which access is requested already has "reasonable access." Only where reasonable access "does not exist or cannot be economically constructed outside the boundaries of the park" may DPR grant a permit for right-of-way access across state parkland. (Ibid.)[18]

The only reasonable interpretation of Public Resources Code Section 5003.5 paragraph two is that access provided under the conditions of this section are intended for parcels that are *actually contiguous with* a state park, and cut off from a road or highway located on the far side of parkland. (Pub. Res. Code, § 5003.5, ¶ 2,

describes an "application…for right–of–way across a state park for ingress and egress *to a highway or road from their lands separated from such highway or road by the state park*…" (emphasis added).)

Footnote 18: Public Resources Code Section 5003.5 states, in its entirety:

The department is authorized to provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public and to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks, and for that purpose may enter into contracts or agreements with cities, counties, and other political subdivisions of the State and with other state agencies or with persons, firms or corporations for the acquisition, construction, and maintenance of suitable roads, trails, and pathways.

When application is received by the department, other than under Section 5012, from any person, firm or corporation for right–of–way across a state park for ingress and egress to a highway or road from their lands separated from such highway or road by the state park, the department shall determine whether any reasonable access exists outside the boundaries of the park, or could be economically constructed.

Where reasonable access does not exist or cannot be economically constructed outside the boundaries of the park, the department shall grant a permit for right–of–way across the park over such route and subject to such conditions and construction and maintenance specifications as the department may determine which will cause minimum alteration to the physical features of the park and minimum interference with the use of the park by the public. The permittee shall at his own expense construct and maintain the means of ingress and egress in accordance with the terms and conditions set forth in the permit, noncompliance with which in any part shall be due cause for revocation of such permit. The department may require a permittee or permittees to allow the use of such means of ingress and egress by any other applicant whose lands are similarly situated. The department shall grant a permit for such use under terms and conditions imposed upon existing users, upon payment of a reasonable compensation for construction and maintenance of the road, by the applicant to the existing permittee, or permittees.

Response GO14-37 This comment provides a general recitation and characterization of statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO14-38 The Department may also grant permits and easements to a *public agency* for public roads, for public bicycle and pedestrian trails, and for utility lines, or for "electric, gas, water, sewer, telephone, telegraph and utility lines, and pipelines and structures incidental thereto, to perform a public service or oil or gas pipelines." (Pub. Res. Code, § 5012, subds. (a)-(d).)[19] Before the DPR may lease land pursuant to Public Resources Code section 5003.17, the Director must make a finding "that the use would be

compatible with the use of the real property as a unit or part of a unit and with the sound management and conservation of resources within the unit." (Pub. Res. Code, § 5001.65.)

Most important, and with few exceptions (all of which are inapplicable here), **"[c]ommercial exploitation of resources in units of the state park system is prohibited."** (Pub. Res. Code, § 5001.65.)[20]

Footnote 19: Subdivisions (e) and (f) of Public Resources Code section 5012, which relate to the use of state parks for small craft harbors and recreation areas and oil and gas pipelines, are not relevant.

Footnote 20: In addition to the above statutory regime, which protects our state parkland from unlawful encroachment by those who would seek to use these valuable resources for personal and commercial gain, the Park Preservation Act (Pub. Res. Code, §§ 5400-5409) forbids a public entity's (whether city, county, city and county, etc.) acquisition of existing public parkland for nonpark purposes "unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both." (Pub. Res. Code, § 5401, subd. (a).) Applicability of the Park Preservation Act will be analyzed separately below.

Response GO14-38 This comment provides a general recitation and characterization of statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO14-39 3. Analysis

As discussed above and elsewhere, the proposed Project is not a public transportation project. (See discussion, supra pp. 8-12.) While the Project proposes that provision of new access to LA State Historic Park will be an important feature of the Project, the Park is already well-served by existing Metro service via the Gold Line Metro Station, which operates only a few hundred feet from where the Project's proposed Chinatown/State Park Station would be located. In addition, the DEIR provides information about local bus lines operating in the Project area, including near LASHP.

"The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property…" (DEIR, p. 2-12.) The relevant legal question to determine whether the state parkland at LASHP may be made available for the purpose of providing access to Dodger Stadium is "whether any reasonable access exists outside the boundaries of the park or could be economically constructed." (Pub. Res. Code, § 5003.5.)

There is but one answer possible: physical access to Dodger Stadium is plentiful.

Response GO14-39 This comment provides a general recitation and characterization of statutes and regulations. Refer to Topical Response A, SB 44, for discussion of the proposed

Project's consistency with the requirements of SB 44. As discussed in Topical Response A, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would enhance public transit options for the park by providing passenger access to Chinatown, Los Angeles State Historic Park, and to nearby neighborhoods, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex, pedestrian access enhancements which could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. In addition, the station canopy would provide much needed shade. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of the location of the Chinatown/State Park Station, including how the proposed Project's Chinatown/State Park Station location was chosen over the other potential locations because it minimized the proposed Project's potential footprint within the Los Angeles State Historic Park and impacts to neighboring properties while maintaining transit access to the Park and surrounding communities.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and

businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO14-40 Dodger Stadium is not made landlocked by its proximity to LA State Historic Park—it is not even immediately adjacent to LA State Historic Park. At its nearest point to the park Dodger Stadium is more than 1,500 feet distant. It is accessible by numerous roadways and entrances, and as the DEIR notes, on game days is already served by Metro's Dodger Stadium Express. (DEIR, p. ES-19.) Because there are already numerous entrances to Dodger Stadium, as a matter of law it must be found that "reasonable access exists outside the boundaries of [LA State Historic Park]."

LASHP is therefore neither necessary nor available to provide additional Dodger Stadium with additional access it does not need. The controlling Public Resources Code section provides no exception. Moreover, since access to Dodger Stadium already exists, no "alteration of the physical features of the park" or level of "interference with the use of the park by the public" can be justified. No part of LASHP is necessary to provide access to Dodger Stadium, and Public Resources Code section 5003.5 therefore prohibits use of the park by the Project.[21]

The DEIR states that a secondary Project purpose is to provide access to LASHP from Union Station and Dodger Stadium and local neighborhoods near Dodger Stadium. But the DPR has already provided for adequate access to LASHP. Metro's Gold Line Chinatown Station and several bus lines already provide convenient public transportation to the park, and many people arrive by bicycle or on foot. It is noteworthy that ARTT LLC approached Metro and the Department with its proposal. DPR did not ask for help increasing park access, because it has already provided adequate access.

Footnote 21: It makes no difference under Public Resources Code section 5003.5 whether access being sought is ground-based or aerial. The statute makes no distinction between provision of ground or aerial access.

Response GO14-40 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would

reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would also improve community access to the Los Angeles State Historic Park by providing an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Refer to Response GO14-39 for discussion of public transit options for Los Angeles State Historic Park. Further, as discussed Section 2.0, Project Description, of the Draft EIR, the proposed Project could also provide pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/ State Park Station, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge to improve access from North Broadway to the park. These features of the proposed Project would improve access to the Los Angeles State Historic Park. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park.

Comment GO14-41 Moreover, these alleged access enhancements are illusory and speculative. On days where there is no baseball game or other event at Dodger Stadium, the Project would operate at the discretion of the operator, not on a regular schedule. As the DEIR notes, service would vary, "based on demand." (DEIR, p. 2-42.) If demand is insufficient, nothing guarantees that the Project will operate. Likewise, travel to the Park from Dodger Stadium station for neighborhoods near Dodger Stadium is subject to private approval and is completely speculative. (DEIR, p. ES-10: "The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger Stadium Station to include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.")

Response GO14-41 Refer to Section 2.0, Project Description, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Response GO14-22 for a discussion of how proposed Project may vary the number of cabins in service and speed throughout the day, based on demand, just as Metro trains and buses do, the proposed Project would operate under a pre-determined, regular operating hour schedule. Refer to Topical Response

F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment GO14-42 Further, the DEIR analysis of neighborhood ridership is deeply flawed. First, as noted above it relies on the speculative availability of Dodger Stadium Station, and then arbitrarily doubles the size of the surveyed ridership area around the stadium from a half-mile walking distance to an entire mile, assuming that the same number of people who might walk half a mile would also ride bicycles up to a mile. (DEIR, p. 3.17-25.) Second, the DEIR does not analyze, or even discuss, the hilly topography of the neighborhoods surrounding Dodger Stadium that would allegedly be served by a new mobility hub, assuming it is ever built. There seems to have been no survey of potential Dodger mobility hub users to determine whether they either would walk or ride to a hub facility. Third, the park user ridership analysis assumes, without evidentiary support, that 10% of existing Gold Line users to the park would instead use the gondola, assuming there is enough demand that it is running at the time. (*Ibid*.)

Response GO14-42 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. As discussed in Section 3.17, Transportation, of the Draft EIR, ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis, growth rates in population and jobs as forecast using the City of Los Angeles travel demand model, and United States Census journey to work mode split data. As discussed in Appendix N, Transportation Appendices, of the Draft EIR, the typical reasonable walking distance to high-quality fixed route transit is one half-mile, which was then calculated based on the actual street network. A one-mile biking distance for the Dodger Stadium Station was chosen for the evaluation of the Dodger Stadium Station since the mobility hub would facilitate safe and convenient connections to Elysian Park and Solano Canyon, which are beyond a half-mile walking distance. A one mile ride on a

bicycle, even with some grade change, can comfortably be made in fifteen minutes or less. Fifteen minutes is a typical planning time that many transit riders are willing to incur to reach a station, which compares with a one-half mile walking distance. This estimated time was based on the professional judgment of Fehr & Peers which prepared Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR.

The proposed Project would serve events at the Los Angeles State Historic Park. As described on page 3.17-26, in Section 3.17, Transportation, in the Draft EIR, the analysis to estimate Los Angeles State Historic Park event ridership assumed a 10 percent capture rate for rides between LAUS and the Los Angeles State Historic Park for an average sized event (ranging from craft fairs drawing 6,000 to 8,000 people per event to evening concerts drawing 12,000 to 20,000 people per event, averaging 11,200 people per event), meaning that 10 percent of the attendees would ride the proposed Project. This estimated capture rate was based on the professional judgement of Fehr & Peers which prepared Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR, including the ridership model, as event attendee data were available and provided by State Parks, but event attendee mode split data were not available. However, compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the much shorter headways compared with the Metro L Line (Gold) and area bus service would result in more frequent, higher capacity transit service, and the travel time would be less. The commenter did not provide any specific data to indicate why a 10 percent capture rate should be considered an unreasonable assumption for Los Angeles State Historic Park event attendee ridership.

Furthermore, as noted on page 3.17.34 and 3.17.35 of Section 3.17, Transportation, of the Draft EIR, the proposed Project would generate neighborhood ridership that would reduce vehicle miles traveled (VMT), but to provide a more conservative analysis, only the VMT benefits of the proposed Project were calculated on Dodger Stadium game/event days. Accordingly, while the VMT for other ridership scenarios such as neighborhood riders and the Los Angeles State Historic Park users was calculated, the Draft EIR conservatively only assumes VMT reductions from Dodger Stadium game and event ridership in its analysis, including in Section 3.03, Air Quality and Section 3.08, Greenhouse Gas Emissions, of the Draft EIR. Including VMT reductions from other ridership sources analyzed (e.g., neighborhood riders, tourists) would provide additional air quality and greenhouse gas emissions reductions benefits which were conservatively not assumed in the Draft EIR's analysis. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines, § 15124.) The Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test

or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment GO14-43 Finally, Public Resources Code section 5012 is not applicable to the Project with respect to the Project's proposed use of LASHP. No public agency is requesting access for the purpose of providing roads, public bicycle or pedestrian trails, or utility lines. No request is being made for "electric, gas, water, sewer, telephone, telegraph" or other utility lines. No public or private entity is requesting use of the park for oil or gas pipelines.

The Project request is for access as a private transportation project to serve a commercial sports and entertainment venue with existing substantial access, including convenient access by public transportation (Dodger Stadium Express). While the DEIR suggests the Project would be nominally open to the public when it is operating, on Dodger game days or for special events at Dodger Stadium, Dodger ticket holders (and presumably special event patrons) would have priority access to gondola use. (DEIR, p. 3.17-25.)

As explained above, the Project is not public transportation. It is better described as a "courtesy shuttle service for patrons of one or more specific establishments" (see 42 U.S.C., § 5302 subd. (B)). In other words, the DEIR description of the Project as open to the public (except when it isn't) doesn't change that the gondola is a commercial private transit enterprise to benefit Dodger Stadium and whatever future development might one day be built there. "Commercial exploitation of resources in units of the state park system is prohibited." (Pub. Res. Code, § 5001.65 (emphasis added).)

Response GO14-43 This comment provides a general recitation and characterization of the federal and state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading

up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As noted in Section 3.17, Transportation, of the Draft EIR, on peak game attendance days, pre-purchase of timed tickets would be implemented, and game-day riders possessing a timed ticket would have priority boarding. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment GO14-44 4. Conclusion

Based on the above, LA Parks Alliance strongly objects to any use of LASHP for the Project's private commercial use. Construction and operation of the Project within LA State Historic Park would plainly violate state law that protects units of state park system from commercial exploitation. Nor is there any exception within the relevant statutes that allows for the Director and Department to agree to unlawful commercial exploitation of LA State Historic Park to take advantage of proposed desirable Project features (for example, a mid-park bridge across the Gold Line rail to Broadway, an enhanced concession area, a mobility hub). Should the Director and Department do so, they would violate the fundamental duties set forth in Public Resources Code sections 5001, 5001.2, 5001.65, 5003, 5003.5, 5003.17, and other statutes.

The Department must manage state park units "for the benefit and inspiration of all state residents and visitors to the state parks," and the Director must conserve "the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations." (Pub. Res. Code, § 5001, subd. (a)(2), and § 5001.2.) Commercial use of the state parks is prohibited. (Pub. Res. Code, § 5001.65.)

The proposed Project may not lawfully use any part of LA State Historic Park for access to Dodger Stadium, including its airspace.

Response GO14-44 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Responses GO14-32 through GO14-43 for responses to comments contained in this section of this letter.

Comment GO14-45 E. The Public Park Preservation Act and Other Relevant Statutes Prohibit Use of LA State Historic Park for Non-Park Uses.

Public comments submitted during the scoping comment period show that many community members object to use of public parkland for the private commercial gondola project. A representative sample included in DEIR Appendix A follows:

- Email comment of Julie Rico, Nov. 7, 2020: I am concerned about the potential negative impacts of the proposed Los Angeles Aerial Rapid Transit project on Los Angeles State Historic Park which we view as the greatest threat to Northeast Los Angeles open space in over 20 years.

- Comment of Tom Norris, Nov. 12, 2020: "Los Angeles State Historic Park (LASHP) is a unique public open space with historical significance and strong community ownership… This is a park space that is used often by family and friends, especially now when meeting outdoors in open spaces is the only safe option during this Covid health crisis. We do not want to give our public lands over to the McCourt family!"

- Email comment of Phyllis Ling, Nov. 16, 2020: "[T]his gondola would cut through the middle of the Los Angeles State Historic Park. This project would be at the expense of the Chinatown Community, who fought hard for this open space, rather than see it turned into an industrial office park. After it was dedicated as park land, the community waited many more years for construction to be completed. And now, just as we are beginning to enjoy this open space, a private company wants to cut through the heart of the park with this massive monstrosity. This is offensive, especially as the City is making efforts to advance social equity. This public resource in a low income community must not be sacrificed to a private company for private gain."

- Comment of Jeff Pawling, Nov. 17, 2020: "Personally, I oppose this gondola system being constructed over the Los Angeles State Historic Park. If Frank McCourt couldn't deliver a World Series to LA, why would we deliver him a tram over a beloved and beautiful park? This EIR needs to address the exact route the proposed gondola would take over the park and how it would affect the park as a whole both during and after construction. There are simply other efficient modes of transportation that can be utilized to transport people to and from Dodger Stadium that do not involve a gondola."

- Comment of Philip Lee, Nov. 17, 2020, who requests: "Full transparency on the rapid transit and how it affects public lands. McCourt should not be given any public land."
- Letter comment of Los Angeles River State Park Partners, Nov. 10, 2020, p. 2: "Los Angeles State Historic Park is now a gem among the State Parks in the Los Angeles area and a national model for urban parks. But the State's major investment that made LASHP possible may be at risk if private interests are allowed to spoil the public good represented by the park."

Response GO14-45 This comment provides a general recitation and characterization of certain comments received during the public scoping period. Refer to Responses GO14-6 through GO14-12 for discussion of comments on the NOP for the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act.

Comment GO14-46 In addition to the express limitations of Government Code sections 5001 through 5019.5 discussed above, the California Public Park Preservation Act and other statutes detail additional limitations on the use of California parkland resources, and in particular on state park historical units. Our legislature has enacted strict limitations on how California parklands may be used, whether by public agencies or by private actors who would exploit these precious resources.

The loss of any parkland for the benefit of the Project constitutes a significant and unavoidable environmental impact, requiring denial of the Project or selection of a feasible alternative. (Pub. Res. Code, § 21002: "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives…")

Response GO14-46 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act.

Comment GO14-47 1. The Public Park Preservation Act does not authorize acquisition of public parks, including LA State Historic Park, for use by the Project.

The Public Park Preservation Act of 1971 ("Park Preservation Act" or "Act") (Public Resources Code sections 5400–5409) forbids the acquisition of land by a public agency if the land to be acquired is already in use as a public park at the time of acquisition, "unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both…" (Pub. Res. Code, § 5401(a).) While the Park Preservation Act nominally restricts only public agencies, that does not mean such acquisitions are permitted by private entities or actors (since other generally applicable Public Resource Code sections already restrict these actions — see Part. I(D), supra pp. 12-18). The Park Preservation Act thus

provides no alternative vehicle for Metro (or ARTT LLC or any other entity) to acquire any portion of LA State Historic Park for the benefit of the proposed Project.

Although it is clearly not possible for ARTT LLC to acquire any portion of LA State Historic Park for the Project pursuant to the Park Preservation Act, it is nonetheless appropriate to briefly review the Act to illustrate the nature of limitations that would be imposed on public agencies were such an agency inclined to attempt use of the Act's procedures to assist the Project proponent. The DEIR is incomplete in not including this important background information to assist decisionmakers and members of the public in understanding that even a state agency could not acquire this land for the benefit of the Project.

Response GO14-47 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO14-48 As noted above, the basic premise of the Park Preservation Act is explained in Public Resources Code section 5401, subdivision (a), which states in its entirety:

> No city, city and county, county, public district, or agency of the state, including any division, department or agency of the state government, or public utility, shall acquire (by purchase, exchange, condemnation, or otherwise) any real property, which property is in use as a public park at the time of such acquisition, for the purpose of utilizing such property for any nonpark purpose, unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both, as required by the provisions of this chapter to enable the operating entity to replace the park land and the facilities thereon.

Stated differently, the Parks Preservation Act allows a California public agency (but not a private entity or actor) to acquire existing parkland and use it for a non-park purpose, so long as the "acquiring entity pays or transfers" "sufficient compensation or land, or both," to the public agency that operates the existing parkland. But this general premise operates within very strictly defined limitations, as explained in subsequent sections of the Act.

Initially, it is important to note that none of the express exceptions of the Act apply to transportation infrastructure, whether private or public. The first exception relates

to "the construction or maintenance of underground utility services." (Pub. Res. Code, § 5402.) The second exception is for a public utility (public or private) acquiring land to provide services to the park and where the services cannot feasibly be located underground. (Pub. Res. Code, § 5403.) The third exception relates to a public utility (public or private) acquiring an interest in a waterway. (Pub. Res. Code, § 5403.5.)

Response GO14-48 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act.

Comment GO14-49 Since no exception applies, a public agency might acquire land at LA State Historic Park, but only if it first provided the cost of substitute park land, actual substitute park land, or some combination of the two. But "cost of acquiring substitute park land" means providing sufficient payment to cover:

> [L]and of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land and facilities by generally the same persons who used the existing park land and facilities, and the cost of acquiring substitute facilities of the same type and number, plus the cost of development of such substitute park land, including the placing of such substitute facilities thereon.
>
> (Pub. Res. Code, § 5405, subd. (a).)

Likewise, "substitute park land" provided by the acquiring agency means:

> [Land] of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land by generally the same persons who used the existing park land, and the cost of acquiring substitute facilities of the same type and number, plus the cost of development of such substitute park land, including the placing of such substitute facilities thereon.
>
> (Pub. Res. Code, § 5405, subd. (b).)[22]

The proposed Project cannot utilize the Park Preservation Act because no public agency seeks to be the "acquiring entity" of LA State Historic Park land on its behalf. The DEIR nonetheless fails as an informational document because it evaluates neither the availability nor cost of substitute park land to adequately compensate the people of California for use of public parkland that has been set aside and held in trust for their benefit. See California Public Resources Code, section 5019.91, subdivision (b):

> **The mission of the California State Park system** is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. **State parks are set aside** to protect their natural, historical, cultural,

and recreational values **in perpetuity for the people of the state**. (Emphasis added.)

Footnote 22: Any combination of exchange of substitute park land and payment to allow acquisition of new substitute park land must meet the same standard. (Pub. Res. Code, § 5405, subd. (c).)

Response GO14-49 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act.

Comment GO14-50 The Park Preservation Act also allows for improvement of unacquired park land in lieu of acquiring substitute park land. (Pub. Res. Code, § 5404.) However, that alternative would still require the acquiring agency to account for and pay the entire cost in land or compensation as described in Public Resources Code section 5405. Moreover, it would only be possible where the land to be acquired is "less than 10 percent of the park land, but not more than one acre." (Ibid.) Here, the footprint of the proposed Project's Chinatown/State Park Station is "2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park." (DEIR, p. 3.11-38.) This is both less than ten percent of the 32-acre park and less than an acre. But it does not account for the massive use of airspace required for the Project (almost 60,000 square feet as seen from an overhead view, a number which does not include the vague "Additional Separation Buffer"). (DEIR, p. 2-52.) The Project would therefore utilize well over an acre of LA State Historic Park land, and the "in lieu" alternative would not be available to a public agency desiring to acquire the land for a non-park purpose. (As discussed, a private entity cannot take the land at all.)

The informational value of the Park Preservation Act is to assist the public in understanding underlying limitations on the use of public parkland. Only an absolutely absurd interpretation of the statutes describing the fundamental duties, powers, and authorities of the Department of Parks and Recreation and the Director of Parks could lead one to conclude that even though no public agency can use public parkland without adequately compensating the people of California for land held in perpetuity, that the Director and Department could quietly negotiate with a private actor to allow acquisition or exchange of parkland for non-park use for only minor improvements without considering the cost and availability of "substitute park land" or calculating and obtaining that value.[23]

To be clear, the Public Park Preservation Act is not applicable to the Project. It does, however, inform the propriety of a monetary or land exchange, if one were possible, or the offer of public benefits such as park improvements in exchange for use of public parkland. It provides at least one basis to consider the amount of compensation necessary to justify a private taking of land meant to be held in perpetuity by and for the people of California, assuming such a taking is permissible, which it is not. The

DEIR fails as an informational document for failing to provide this information. The DEIR acknowledges that LA State Historic Park serves "a region that has been historically limited in terms of access to parkland" (DEIR, p. 2-9), but it does not include the information necessary to allow members of the public and decisionmakers to understand the profound impacts the significant loss of public parkland at LA State Historic Park would have.[24]

Footnote 23: As discussed, this is "land of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land by generally the same persons who used the existing park land, and the cost of acquiring substitute facilities of the same type and number, plus the cost of development of such substitute park land, including the placing of such substitute facilities thereon." (Pub. Res. Code, § 5405, subd. (b).) LA Parks Alliance does not believe such land exists.

Footnote 24: While the discussion in this section is focused on the significant adverse impact and the DEIR's lack of useful information with respect to compensation for loss of land at LA State Historic Park, LA Parks Alliance notes that it is equally applicable to El Pueblo de Los Angeles Historical Monument. See also discussion re Land Use and Planning conflicts, infra pp. 73-75.

Response GO14-50 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act. Refer to Response GO14-33 for additional information about the Additional Separation Buffer. Refer to Response GO14-153 for a discussion of how the proposed Project would be consistent with the El Pueblo General Plan.

Comment GO14-51 2. Public Resources Code section 5019.59 prohibits use of LA State Historic Park for the Project.

There are also several Public Resources Code sections specifically relevant to the proposed Project because of its proposed use of LA State Historic Park. For example, Public Resources Code section 5019.50 requires that "[a]ll units that are…a part of the state park system…shall be classified by the State Park and Recreation Commission into one of the categories specified in [Article 1.7 of Chapter 1 of the Public Resources Code]." LA State Historic Park, as its name suggests, is classified as a "historical unit." (Pub. Res. Code, § 5019.59; see DEIR, pp. 3.11-1 to 3.11-2, 3.11-38.)

Historical units of the state park system are expressly limited in the type and nature of development allowed within the unit. As the DEIR notes, the primary purpose of historical units is "to preserve objects of historical, archaeological, and scientific interest, and archaeological sites and places commemorating important persons or historic events." (Pub. Res. Code, § 5019.59; DEIR, p. 3.11-38.) Under state law, development is therefore dramatically limited:

> The *only facilities that may be provided* are those required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking. Upon approval by the commission, lands outside the primary historic zone may be selected or acquired, developed, or operated to provide camping facilities within appropriate historical units. Upon approval by the State Park and Recreation Commission, an area outside the primary historic zone may be designated as a recreation zone to provide limited recreational opportunities that will supplement the public's enjoyment of the unit. Certain agricultural, mercantile, or other commercial activities may be permitted if those activities are a part of the history of the individual unit and any developments retain or restore historical authenticity.
>
> (Pub. Res. Code, § 5019.59 (emphasis added).)

Response GO14-51 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO14-52 The DEIR notes that the Project conflicts with the Park's General Plan, which does not permit the Project. It provides a conclusory rationale that the park's General Plan may be revised to allow for "transit," and argues that if the General Plan is so revised the Project will then be consistent with LA State Historic Park's General Plan and with Public Resources Code section 5019.59, "which permits facilities for the comfort and enjoyment of the visitors, such as access." (DEIR, p. 3.11-42.) But the DEIR's analysis of Public Resources Code section 5019.59 is grossly incomplete, suggesting that so long as proposed development is within the list of items (access, parking, water, sanitation, interpretation, or picnicking) there is no further analysis necessary. But of course there is.

The plain text of the statute does not permit any and all development that might be made "for the comfort and enjoyment" of park visitors. Public Resources Code section 5019.59 uses the word "required" to modify and limit the type and amount of development at a state park historical unit. As already discussed, the Park has plentiful access via several entrances, and is already served by existing Metro train service and numerous bus lines. Further development to provide additional access is not required. Nothing in the DEIR provides substantial evidence to support a contrary conclusion.

Further, and as already discussed, on days where no baseball game or event is held at Dodger Stadium, the Project would operate at the discretion of the operator, not on a regular schedule. Service would vary "based on demand." (DEIR, p. 2-42.) Nothing guarantees the Project will operate daily to provide Park access. Travel to the Park from Dodger Stadium station for neighborhoods near Dodger Stadium is subject to private approval and thus completely speculative. (DEIR, p. ES-10.) And on Dodger

game or stadium event days, use of the Project to get to the Park would be secondary to ticket holders' preferred use. (DEIR, p. 3.17-25.)

Appendix N's meager analysis of ridership for users of LA State Historic Park is incomplete and entirely speculative. The DEIR provides no discussion of daily ridership use for LASHP, whether from the Project's Union Station terminus or Dodger Stadium terminus. (DEIR, Appx. N Ridership Model, pp. 13-14, 15-16.) It only analyzes ridership to special events at the Park. Even then, the Fehr & Peers Ridership Model Development report acknowledges that it is entirely based on guesswork. "No data are available for mode share of attendees travelling to events at the Park. For the purposes of this analysis, Fehr & Peers assumed a 10% mode split for attendees taking transit from Union Station." (Ibid., p. 13.)

Thus, the DEIR assumes with no apparent basis or supporting data that on special event days as many as 10% of park visitors traveling from LA Union Station to the Park would instead use the Project for access. (DEIR, p. 3.17-26.) Put another way, the DEIR acknowledges that 90% of park special event riders from Union Station would arrive some other way than the Project. If not for the Project siphoning off a small percentage of park visitors, 100% would have little difficulty in arriving via existing alternatives. Even assuming the 10% assumption were true, and no substantial evidence supports it, how does the DEIR's best case assumption concluding that 90% of visitors arriving from Union Station by means other than the Project support a conclusion that it provides required access? This is the only relevant question for development of historical unit under Public Resources Code section 5019.59.

Likewise, discussion of neighborhood ridership does not describe in any detail the number of people who would use the Project to travel from the Dodger Stadium terminus and depart at the Chinatown/State Park Station, assuming the Project even runs on non-Dodger game or event days. Using information provided in the DEIR it is impossible to conclude that a significant number of LA State Historic Park users would arrive via the Project. The analysis does not distinguish between those who depart the Project at Chinatown/State Park Station to go to the Park as opposed to other destinations. (DEIR, Appx. N Ridership Model, p. 21.) There is no substantial evidence to show the Project is required to provide access to LA State Historic Park, the mandatory finding required by Public Resources Code section 5019.59.

Response GO14-52 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not

contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Further, as discussed in Response GO14-22, refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, while the proposed Project may "vary the number of cabins in service and speed throughout the day, based on demand," just as Metro trains and buses do, the proposed Project would operate under a pre-determined, regular operating hour schedule.

Refer to Section 3.17, Transportation, of the Draft EIR, which analyzed different ridership types in order to calculate the estimated VMT for the proposed Project. As discussed in Section 3.17.3, Methodology, of the Transportation analysis, ridership estimates included "a number of distinct market segments including: Dodger Stadium game and event attendees, employees, tourists, neighborhood riders, and Los Angeles State Historic Park visitors and event attendees." In addition to Dodger Stadium game and event attendees, as discussed on page 3.17-34 in Section 3.17, Transportation of the Draft EIR, it is estimated that ridership from nearby neighborhoods would range between 200 and 575 riders (400 to 1,150 trips for round-trip), and the daily number of tourists who would ride the proposed Project is estimated to vary between 1,265 tourists and 3,370 tourists. As discussed in Section 3.17, ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis, growth rates in population and jobs as forecast using the City of Los Angeles travel demand model, and United States Census journey to work mode split data. As discussed on page 3.17-26, of Section 3.17, of the Draft EIR, ridership for the daily park use is included in the ridership estimates for neighborhood riders. Table 3.17-4, Proposed Project Estimated Daily Riders, provides the daily weekday riders and daily weekend riders for Dodger Stadium access, other special events, and neighborhood riders (inclusive of neighborhood/regional and daily Park access). Transit ridership by nature is related to a variety of uses. Some riders using the Chinatown/State Park Station will visit the Los Angeles State Historic Park, others will travel to and from the businesses, community uses and residences, such as the William Mead Homes, located within a ½ mile walking distance of the station. Some riders will visit multiple uses. Given the mixed use nature of transit stations, it is typical practice to estimate ridership and report it for the station area

not for individual uses. Due to the fact that the proposed Project would serve event destinations in Dodger Stadium and the Los Angeles State Historic Park, ridership estimates were prepared for both, which is why those destinations and market segments are calculated separately. The proposed Project would serve events at the Los Angeles State Historic Park. As described on page 3.17-26, the analysis to estimate Los Angeles State Historic Park event ridership assumed a 10 percent capture rate for rides between LAUS and the Los Angeles State Historic Park for an average sized event (ranging from craft fairs drawing 6,000 to 8,000 people per event to evening concerts drawing 12,000 to 20,000 people per event, averaging 11,200 people per event), meaning that 10 percent of the attendees would ride the proposed Project. This estimated capture rate was based on the professional judgement of Fehr & Peers which prepared Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR, including the ridership model, as event attendee data were available and provided by State Parks, but event attendee mode split data were not available. However, compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the much shorter headways compared with the Metro L Line (Gold) and area bus service would result in more frequent, higher capacity transit service, and the travel time would be less. The commenter did not provide any specific data to indicate why a 10% capture rate should be considered an unreasonable assumption for Los Angeles State Historic Park event attendee ridership.

Refer to Section 3.17, Transportation, of the Draft EIR for a detailed discussion of potential impacts of the proposed Project on the existing surrounding communities, including an overall reduction in vehicle miles traveled (VMT). Furthermore, as noted on page 3.17-34 and 3.17-35 of Section 3.17, Transportation of the Draft EIR, the proposed Project would generate neighborhood ridership that would reduce vehicle miles traveled (VMT), but to provide a more conservative analysis, only the VMT benefits of the proposed Project was calculated on Dodger Stadium game/event days,. Accordingly, while the VMT for other ridership scenarios such as neighborhood riders and the Los Angeles State Historic Park users was calculated, the Draft EIR conservatively only assumes VMT reductions from Dodger Stadium game and event ridership in its analysis, including in Section 3.03, Air Quality and Section 3.08, Greenhouse Gas Emissions, of the Draft EIR. Including VMT reductions from other ridership sources analyzed (e.g., neighborhood riders, tourists) would provide additional air quality and greenhouse gas emissions reductions benefits which were conservatively not assumed in the Draft EIR's analysis.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data.

Comment GO14-53 An additional limitation of Public Resources Code section 5019.59 restricts commercial activities. The project is not a public transportation project. It will be privately built and operated to transport ticket holders to Dodger Stadium for baseball games and private events, a commercial activity. Commercial activities are only permitted at historic units of the state park system when they "are a part of the history of the individual unit and any developments retain or restore historical authenticity." (Pub. Res. Code, § 5019.59.) Obviously, the Project has nothing to do with the historic identity of LA State Historic Park. Since the DEIR does not provide sufficient evidence to show that the Project is required to provide access to LA State Historic Park, it must be considered a prohibited commercial activity.

The Department of Parks and Recreation has jurisdiction over LA State Historic Park and may amend its General Plan to permit lawful activities, but it does not have the ability to modify the General Plan to allow commercial activities in violation of Public Resources Code section 5019.59. (See Pub. Res. Code, § 5001.65: "Commercial exploitation of resources in units of the state park system is prohibited." And see Pub. Res. Code, § 5009.53: "Improvements [to state park units] that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks." (Emphasis added.))

The Department simply cannot modify the General Plan for the benefit of the Project.

Response GO14-53 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Response GO14-52 for discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan and the Los Angeles State Historic Park General Plan Amendment. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of SB 44. As discussed in Topical Response A, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO14-54 The DEIR fails to identify the significant and unavoidable land use conflict between the Project and Public Resources Code section 5019.59. No Project alternative including an alignment on or over LA State Historic Park can be built, because the Department of Parks and Recreation may not approve a facility that is not required for access and may not approve commercial activity with no historic connection to a historical unit of the state park system.

Response GO14-54 This comment provides a general recitation and characterization of the state statutes and regulations. Refer to Topical Response F, Los Angeles State Historic Park, for a

discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Response GO14-52 for discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan and the Los Angeles State Historic Park General Plan Amendment.

Comment GO14-55 F. Project Approval Would Pre-Commit the Future Discretion of State and Local Officials, in Conflict with the California Constitution and State and Local Law.

Proposed Project approvals with the City include a development agreement and franchise agreement. (DEIR, pp. 2-61 to 62.) Approvals for the use of airspace over LA State Historic Park, which are not lawfully available to the Project, would require an amendment to the park's general plan and an easement and/or aerial easement pursuant to Govt. Code section 14666 and a lease or other agreement under Public Resources Code section 5003.17 to allow construction and operation on and over the park. (Ibid. at p. 2-61.)

A development agreement with the City of Los Angeles would be limited to 20 years. (Ibid.) A franchise agreement with the City is limited to 21 years. (Los Angeles City Charter, § 390, subd. (c).)

Franchises of up to 40 years may be granted "for the construction and operation of subways, elevated railways and grade separated railways." (LA City Charter, § 390(c).) The Project is none of these and so is limited to a maximum length of 21 years. LA Parks Alliance notes that, unlike the secretive sole source contract awarded to ARTT LLC, before the City may grant any franchise, the City Council must "advertise its intention to grant the Franchise and shall award the Franchise to the highest responsible and responsive bidder after competitive bidding, in accordance with the procedures prescribed by ordinance governing the granting of Franchises." (Ibid., subd. (b).)

Even if the Project could lawfully obtain the necessary approvals to operate on and over LA State Historic Park, and it cannot, agreements made with the Department of Parks and Recreation may not exceed 10 years, unless a future "Joint Legislative Budget Committee" agrees with the Department's extension of the agreement (Pub. Res. Code, § 5003.17, subd. (d)(2).) Project approvals made now would therefore tie the hands of future City and state elected officials, precluding them from exercising their complete authority and discretion to choose not to renew the development agreement, franchise agreement, and lease or other agreements necessary for the project to move forward.

Given the express limitations of the public resources code to limit agreements for the use of state park resources to no more than 10 years, with extensions beyond that time made under the sole authority of a future joint legislative budget committee based on documentation to be provided by a future Director, it would be highly improper for the Department of Parks and Recreation to enter into an agreement to

construct private infrastructure that would nullify the discretion of a future Director and future members of the joint legislative budget committee. Initial approval of such a lease agreement by the current Department and Director, part of the executive branch of our state government, even assuming it is lawful in the first instance which it is not, would pre-commit the future discretion of elected legislators by creating a status quo that would be impossible to undo. The pre-commitment necessary to approve the Project for a term longer than the legislature has permitted violates basic separation of powers principles under the California Constitution and hamstrings the discretion of future elected officials from disapproving the continuation of the Project.[25]

The DEIR fails to adequately describe or engage with any of the above limitations and therefore fails as an informational document.

Footnote 25: See Cal. Const., art. III, § 3: "The powers of state government are legislative, executive, and judicial. Persons charged with the exercise of one power may not exercise either of the others except as permitted by this Constitution." "The purpose of the [separation of powers] doctrine is to prevent one branch of government from exercising the complete power constitutionally vested in another…" (Younger v. Superior Court (1978) 21 Cal.3d 102, 117.)

Response GO14-55 This comment provides a general recitation and characterization of the state statutes and regulations and case law. The decision of any single public agency with jurisdiction over the proposed Project would have no impact on another agency's separate independent authority related to the proposed Project, and the proposed Project would not be able to proceed if it was unable to obtain all required approvals for the proposed Project.. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park.

Comment GO14-56 G. The DEIR Engages in Improper Project Piecemealing by Failing to Consider or Analyze Foreseeable Development of Land Around Dodger Stadium.

1. Legal background

The California Environmental Quality Act's definition of "project" contains one of the fundamental black letter law concepts of California environmental law: "'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (CEQA Guidelines, § 15378 (emphasis added).) "'Project' is given a broad interpretation … to maximize protection of the environment." (Riverwatch v. Olivenhain Mun. Water Dist. (2009) 170 Cal.App.4th 1186, 1203 (emphasis added.) Project descriptions must accurately reflect the whole of the action considered. (McQueen v Board of Dirs. (1988) 202 Cal.App.3d 1136, 1144.)

It is improper to divide a single CEQA "project" into smaller sub-projects to evade review of the entire scope of project impacts, a practice known as "piecemealing." "CEQA 'cannot be avoided by chopping up proposed projects into bite-sized pieces' which, individually considered, might be found to have no significant effect on the environment." (Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214, 1223.) Our courts prohibit piecemeal review, in part, to protect public participation in the decisionmaking process, requiring that members of the public and decisionmakers are adequately informed "of the environmental consequences of decisions before they are made. (Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs. (2001) 91 Cal.App.4th 1344, 1356 [emphasis in original].)

In considering whether an EIR is legally adequate, courts look "not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." (California Oak Foundation v. Regents of University of California (2010) 188 Cal.App.4th 227, 262, quoting CEQA Guidelines, § 15151 (emphasis added); see DEIR, p. ES-2.) However, "the fact that a particular development which now appears reasonably foreseeable may, in fact, never occur does not release it from the EIR process. [Citation.] Similarly, the fact that future development may take several forms does not excuse environmental review." (City of Antioch v. City Council (1986) 187 Cal.App.3d 1325, 1338.)

Response GO14-56 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not raise a substantive issue on the content of the Draft EIR. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO14-57 2. Piecemealing concerns were raised in scoping comments; the DEIR ignored the comments and evidence of foreseeable development.

Future development of Dodger Stadium parking lots represents a "foreseeable indirect physical change in the environment" due to the proposed Project that must be considered in the environmental review process. A significant number of comments received during the Project's scoping process raised concerns regarding foreseeable future development of land around Dodger Stadium that is currently used for parking.

For example, one scoping commenter questioned the purpose of the Project's intermediate stop (the Chinatown/State Park Station), "[u]nless someone is planning to build a mall or entertainment complex in the area — perhaps in the freed-up Dodger parking lots? — then the additional stop is a waste of resources that will damage the biological and social environment. Are such plans afoot?"[26] Another wondered, "[w]hat are the plans to develop the Dodoger [sic] Stadium parking lot? Will the LA ART be used year-round? Doubt this expensive system is being created just for Dodger games."[27] Chinatown stakeholder King Cheung expressed suspicion of

the Project: "Why spend $125 millions to build a gondola just to transport people to the Dodgers games? Mc Court [sic] does not own the Dodgers anymore. So it is an expense venture. What does he gain? What is his future goal? Build a downtown Disney type of entertainment center on the empty parking lots?"[28]

In a joint letter from The California Endowment and Homeboy Industries to then-Metro CEO Phillip A. Washington and then-Los Angeles Mayor and Metro Board Chair Eric Garcetti asked simply, leaders of these vital local nonprofits asked simply: "What is the proposed future use of the vacant parking lots at Dodger Stadium caused by the Project?"[29]

Footnote 26: Janet Owen Driggs, email to Cory Zelmer, Nov. 17, 2020, DEIR, Appx. A, pdf. p. 314.

Footnote 27: Patricia Perez, LA ART Virtual Scoping Meeting comment, Oct. 22, 2020, DEIR, Appx. A, pdf. p. 502.

Footnote 28: King Cheung, scoping comment email to laart@metro.net, Nov. 16, 2020, DEIR, Appx. A, pdf. p. 177.

Footnote 29: Dr. Robert. K. Ross, MD (The California Endowment) & Father Gregory Boyle, S.J. (Homeboy Industries), joint comment letter to Phillip A. Washington re NOP comments for LA ART Project, Nov. 16, 2020, p. 12. This letter is already part of the administrative record for the proposed Project.

Response GO14-57 This comment provides a general recitation and characterization of certain comments received during the public scoping period. Refer to Responses GO14-6 through GO14-12 for discussion of NOP comments. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues – has been well established. The speculative scoping comments do not constitute evidence of a larger development plan and therefore did not require a further response. Under CEQA section 15082(b)(1), responses to the NOP are intended help the lead agency identify the significant environmental issues, alternatives, and mitigation measures that should be explored in the EIR. The scoping responses identified in this comment relate to speculative development that is not contemplated as part of the proposed Project. CEQA does not mandate that Metro consider separate projects than the one proposed simply because commenters raised the potential. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community

engagement during the Draft EIR scoping period. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during the scoping period led directly to changes to the proposed Project to incorporate public feedback.

Comment GO14-58 The question of future Dodger Stadium development was also important to Metro at one point—enough so that in asking for information about ARTT LLC's business plan for the project, Metro explained ARTT LLC should "outline the following: … Future plans at Dodger Stadium site." (Los Angeles Aerial Rapid Transit, Response to Metro Request for Information, Sept. 2018, pp. 12-13.)[30] Just as the DEIR fails to address scoping comment concerns about development at Dodger Stadium, ARTT LLC's response interprets the question narrowly: "The only plan for Dodger Stadium related to the ART is to provide a station on the Dodger Stadium property, together with appropriate pedestrian connections from the station to the stadium." (Ibid., p. 13.) The DEIR makes no mention of potential development plans at Dodger Stadium, despite widespread media attention on such plans locally for well over a decade, so ARTT LLC's strategy of interpreting the broad question narrowly seems to have worked. But it has not worked with community members who demand more information.

ARTT LLC's narrow interpretation of Metro's request for information makes no sense. Metro already knew from the basic premise of the Project that it would include a gondola station at or near LA Union Station and at Dodger Stadium. A reasonable interpretation of Metro's question could thus only have been to ask about other development, in addition to the Project's Dodger Stadium Station. Allowing ARTT LLC, owned by McCourt Global, to evade such a fundamental question is either naïve or disingenuous on Metro's part. But even if Metro believes there are no future development plans, as lead agency under CEQA it has an independent duty to consider foreseeable indirect physical changes to the environment due to the Project.

Perhaps Metro didn't consider Dodger Stadium parking lot development foreseeable. This is far-fetched, but not impossible.

But this is why CEQA has a scoping comment process, so community members and responsible and trustee agencies can raise their own questions and concerns, including consideration of potential indirect physical changes in the environment the lead agency may have inadvertently overlooked. (See CEQA Guidelines, § 15083.) If Metro thought Dodger Stadium development was not a reasonably foreseeable indirect change in the environment before scoping, after receiving so many scoping comments they could no longer ignore it. Yet they did.

A review of scoping comments is informative.

Commenter Susan Karat MacAdams cited a story published by the Los Angeles Times in 2012, in which Times' writer Bill Shaikin described land-use documents associated

with the sale of the Los Angeles Dodgers from Frank McCourt to current-owner Guggenheim Baseball.[31]

MacAdams' letter quotes portions of the article highly relevant to foreseeable future development at the Dodger Stadium parking lots:

> The Dodgers' new owners will pay $14 million per year to rent the parking lots from an entity half-owned by Frank McCourt, according to **land-use documents intended to "facilitate the orderly development" of the property surrounding Dodger Stadium**. [¶] The **potential uses for the property include shops and restaurants, homes and offices, and another sports venue, according to documents obtained Friday by The Times.** The **documents also discuss the possibility of parking structures on the land….citing as examples the restaurants and clubs surrounding AT&T Park in San Francisco and Petco Park in San Diego.**
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> (Ibid., emphasis added.)

Footnote 30: This document should be in the administrative record of the case, but is also attached as Exhibit H.

Footnote 31: See DEIR, Appx. A, Susan Karat MacAdams letter to Cory Zelmer, Nov. 16, 2020, p. 2, citing and quoting Bill Shaikin, Dodgers' owners to pay $14 million a year to rent parking lots from McCourt entity, LA Times, May 4, 2012, available at https://www.latimes.com/sports/la-xpm-2012-may-04-la-sp-0505-dodgers-land-20120505-story.html. The Shaikin article is attached as part of Exhibit I.

Response GO14-58 This comment provides a general recitation and characterization of certain comments received during the public scoping period. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues – has been well established. In addition, as discussed in Topical Response G, the Covenants, Conditions, Restrictions, and Easement for Chavez Ravine ("CC&Rs") alluded to in this comment as "land use documents" were adopted over a decade ago and do not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. Refer to Response GO14-57 for a discussion of how the scoping comments do not constitute

evidence of development that should be analyzed in the Draft EIR. Moreover, the reference to the administrative record (Exhibit H) in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 is noted, but the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. The unsolicited proposal process was intended to inform Metro's sole source determination to act as lead agency for the proposed Project and advance it to environmental review. Metro's sole source determination was upheld in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO14-59 Shaikin's article reports that the land-use documents were withdrawn from the Dodgers' bankruptcy proceedings after an attorney for the Times objected to the documents having been filed under seal. They were filed with the Los Angeles County Recorder's office shortly thereafter when McCourt's sale of the Dodgers to Guggenheim Baseball was made final. (Shaikin, supra fn. 31.)

A document entitled "Declaration of Covenants, Conditions, Restrictions and Easements for Chavez Ravine" (hereinafter "Chavez Ravine CC&Rs") is clearly one of the documents referenced in the Shaikin article, as it was executed on April 27, 2012, and recorded May 1, 2012, several days before the Shaikin article was published.[32] As accurately reported by the Los Angeles Times, the agreement is intended, in part, to "facilitate the orderly development" of the Dodger Stadium parking lots (then owned by an entity named "Blue Landco LLC"). (Chavez Ravine CC&Rs, pp. 1-2 (emphasis added).) As Shaikin reported, Blue Landco LLC was co-owned by former Dodger owner McCourt and "an entity affiliated with the new team owners."[33] The agreement contemplates that Landco would gain control of the Dodger Stadium parking lot areas upon construction of parking structures, which would free up space in the parking lot areas to allow for development to occur. (Chavez Ravine CC&Rs, p. 2.) The agreement requires efforts to reduce the amount of parking utilized by Dodger Stadium patrons, including by developing what the agreement refers to as "Mass Transportation." (Ibid., pp. 26-27.) This would allow the required number of vehicle spaces to be reduced first from 19,000 to 16,500 (ibid., p. 11), and with approval of the City of Los Angeles, to below 16,500. (Ibid., pp. 11, 26-27.)

Article IV, subdivision 4.1 of the agreement lays out Blue Landco LLC's rights to pursue development of substantial commercial, residential, medical, academic, and other structures and facilities:

> The Parties acknowledge that Landco, in the future, may apply for governmental approvals for future development on the Landco Parcels (the "Development"),

> which Development may include, but shall not be limited to, (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining and entertainment facilities.
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> (Ibid., p. 25.)

The Shaikin article relates substantial evidence that future development of Dodger Stadium due to the Project is not only foreseeable, but likely. This substantial evidence, without more, is sufficient to show that development of the Dodger Stadium parking lots is a "reasonably foreseeable indirect physical change in the environment" due to the Project. (See CEQA Guidelines, § 15378.) The available evidence shows such development is not only foreseeable but has actually been foreseen and planned for by former Dodger owner Mr. McCourt (who coincidentally owns or controls the Project proponent, ARTT LLC). Metro's apparent failure to already have investigated, analyzed, and discussed the obviously foreseeable indirect physical change in the environment and its potentially significant environmental effects through the Project DEIR after receiving queries from many scoping commenters is unacceptable.

Footnote 32: Declaration of Covenants, Conditions, Restrictions and Easements for Chavez Ravine, recorded May 1, 2012, is attached as Exhibit J.

Footnote 33: Shaikin, supra note 31. While details regarding stadium and parking lot ownership are interesting, and to some degree relevant as the Project proponent is owned or controlled by McCourt, the primary relevance of the agreement in the CEQA analytic context is the foreseeability of future development of Dodger Stadium parking lots, not development of them by any particular individual or entity.

Response GO14-59 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. Refer to Response GO14-58 for further discussion of the CC&Rs. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO14-60 Moreover, there is far more evidence showing that Dodger Stadium development is foreseeable, much of it (including the already-cited 2012 Bill Shaikin article) publicly

known and reported on in local and national media for well over a decade, including reporting on former Dodger owner McCourt's earlier development plans:[34]

- Bill Shaikin and David Zahniser, Dodgers to add shops, a museum, and garages, LA Times, Apr. 24, 2008, available at: https://www.latimes.com/archives/la-xpm-2008-apr-24-sp-dodrep24-story.html (describing a letter sent to Dodger season ticket holders regarding a plan "to transform at least part of the parking lot into an area offering dining and shopping for fans who arrive early and stay late, avoiding pregame and postgame traffic").

- Dakota Smith, New Dodgers Stadium Reveal: We Got Trees!, Curbed Los Angeles, Apr. 24, 2008, available at: https://la.curbed.com/2008/4/24/10572290/dodger-stadium-2 (describing a press release from former Dodger owner Frank McCourt and noting Dodger Stadium would be "a place to visit year-round to shop, dine and play").

- Dylan Hernandez and Bill Shaikin, Stadium makeover is unveiled, LA Times, Apr. 25, 2008, available at: https://www.latimes.com/archives/la-xpm-2008-apr-25-sp-stadium25-story.html (describing the same $500M project, which would occupy "about 15 acres of parking, or about 2,000 spaces").

- On deck: Dodger Stadium Renovations (photo slideshow), LA Times, Apr. 2008, available at: https://www.latimes.com/sports/la-dodger-stadium-improvementspg-photogallery.html (photo slideshow documenting Frank McCourt's public unveiling of $500M proposed Dodger renovations with elected officials, media, and beloved Dodger announced Vin Scully – see select photos in Exhibit I).[35]

- Bill Shaikin, Rick Caruso, Joe Torre withdraw from bidding to buy Dodgers, LA Times, Feb. 23, 2012, available at: https://www.latimes.com/archives/blogs/dodgers-now/story/2012-02-23/rickcaruso-joe-torre-withdraw-from-bidding-to-buy-dodgers (noting that Los Angeles developer and former mayoral candidate Rick Caruso and former Dodgers manager and famed MLB executive Joe Torre withdrew from bidding on the Dodgers in early 2012 because then-owner Frank McCourt refused to include the Dodger Stadium parking lots as part of the sale. The article noted this was "the clearest evidence yet that McCourt intends to keep the lots and try to build on them.")

- John Gittelsohn and Nadja Brandt, Stadium land seen as Dodgers key, Bloomberg News/ArkansasOnline.com, Apr. 8, 2012, available at: https://www.arkansasonline.com/news/2012/apr/08/stadium-land-seen-dodgerskey-20120408/ (discussing Guggenheim Partners' 2012 acquisition of the Dodgers for $2.15B, a record price for any sports team at the time; the article quotes UCLA economics professor Lee Ohanian that such a price

"didn't make sense," and expected that revenue to justify such a high price would come from development of the land around Dodger Stadium.)

- Roger Vincent and Ken Bensinger, Developing Chavez Ravine is likely in play for new Dodgers owner, LA Times, Apr. 16, 2012, available at https://www.latimes.com/sports/la-xpm-2012-apr-16-la-fi-dodgers-land-20120417-story.html (noting numerous well-known real estate developers had made bids for the team, and the $2.15B price suggested development in the parking lot development was likely, recalling that "[f]our years ago, McCourt proposed a $500-million plan to ring the stadium with restaurants, shops and a Dodgers museum.").

- Adrian Glick Kudler, Everyone Betting on Dodger Stadium Land Development, Curbed Los Angeles, Apr. 17, 2012, available at: https://la.curbed.com/2012/4/17/10379072/everyone-betting-on-dodger-stadium-land-development.

Footnote 34: The cited articles, as well as select images from the "On deck: Dodger Stadium Renovations (photo slideshow)", are attached as Exhibit I.

Footnote 35: Presentation materials for the "LA Dodgers Stadium Next 50" still appear on architecture firm Johnson Fain's website at https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/ (last viewed, Jan. 11, 2023). Johnson Fain's Next 50 web page includes visualizations and descriptions of stadium improvements as well as an "[u]rban plaza surrounded by administrative office buildings," a Dodger museum, 20,000 square foot Dodger Store, café, two 8-level 900-car parking structures, and a "Top of Park plaza." The plaza would be "located at the highest elevation on site [and] will feature breathtaking 360 degree views spanning the Downtown skyline and Santa Monica Bay, the Santa Monica and San Gabriel Mountains, and the Dodger Stadium diamond."

Response GO14-60 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system and is not evidence of a larger development project at the Dodger Stadium property. As discussed in Topical Response G, the "Next 50" project was proposed over 15 years ago, and did not proceed after 2008. The current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR. Further, as discussed in Topical Response G, the purported "future" development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and zoning, permits, and approvals, including potentially environmental review, that are not contemplated or

analyzed in the Draft EIR because no such development is proposed. Mere statements on a website are not evidence that such development is currently proposed, or are sufficiently firm or committed to such that environmental analysis is required. Moreover, actions from over a decade ago, and speculative comments attempting to assign a motive to such actions, do not evidence a firm and specific commitment to develop the property surrounding Dodger Stadium. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit "foreseeable" development from its analysis, and CEQA expressly discourages such speculation. Refer to Response GO14-58 for further discussion of the CC&Rs. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO14-61 As discussed above, a letter submitted on behalf of Arts District Community Council of Los Angeles in February 2021 also provides Metro with substantial evidence of foreseeable development of the Dodger Stadium parking lots. (See Exhibit A, supra fn. 2.) The ADCCLA letter cites statements found on McCourt Global's website (still present as recently as March 31, 2022), noting that McCourt Global's "current real estate projects include…260 acres of land at Chavez Ravine in Los Angeles." (See Exhibit B, supra fn. 3.) McCourt Global's revised web page no longer mentions the 260 acres of Chavez Ravine as a "current real estate project." It instead promotes the "Los Angeles Aerial Rapid Transit project" as "an opportunity for our organization to partner with community leaders and stakeholders to contribute to the region's aggressive climate goals and promote sustainability through innovative, zero-emission mobility technology— all while improving mobility and access to Dodger Stadium." (See Exhibit C, supra fn. 3.) But web archives show text on that page state, as recently as January 26, 2021:

> McCourt currently co-owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. Among other plans for the area, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies. (McCourt Global, Real Estate Overview, Nov. 26, 2020, attached as part of Exhibit B, supra p. 3 fn. 3 (emphasis added).)

Metro's choice to allow ARTT LLC to ignore Metro's query as to development plans at Dodger Stadium during early negotiations between the two does not erase the objective reality that such development is reasonably foreseeable. The evidence is manifest that development of a portion of the Dodger Stadium parking lots is not only foreseeable but likely. The DEIR is fatally flawed for failing to consider, analyze, and explain the potentially significant environmental impacts that would result from this foreseeable development that will follow due to the Project. Under CEQA, deferring

environmental review of foreseeable indirect environmental impacts and thus deferring any and all necessary mitigations associated with those impacts is impermissible. “While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines, § 15144.)

Response GO14-61 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro’s Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system and is not evidence of a larger development project at the Dodger Stadium property for which environmental analysis of was “impermissibly deferred.” Further, as discussed in Topical Response G, the purported “future” development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and zoning, permits, and approvals, including potentially environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed. CEQA discourages such speculation. Refer to Response GO14-10 for a discussion of how mere statements on a website do not constitute a firm commitment to potential development such that it is ”foreseeable.” In addition, the unsolicited proposal process was intended to inform Metro’s sole source determination to act as lead agency for the proposed Project and advance it to environmental review. Metro’s sole source determination was upheld in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate).

Comment GO14-62 Most important, since reasonably foreseeable development at Dodger Stadium would be expected to draw many people to the Chavez Ravine site daily on non-game and non-special event days (and would also likely cause additional traffic and transportation issues on days with games and special events from drawing even more people than the approximately 56,000 fans that attend a sellout game at the stadium), the DEIR’s complete failure to consider and analyze impacts of such readily foreseeable development entirely undercuts major claims of Project benefits with respect to reduced energy usage, reduced greenhouse gas emissions, reduced vehicle miles traveled (VMT), and assertions regarding other standard environmental impact analysis categories.

In short, the Project’s environmental review process is made entirely invalid by the Draft EIR’s egregious failure to disclose, discuss, and evaluate the foreseeable development.

Response GO14-62 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro’s Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project

Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO14-63 Moreover, development of Dodger Stadium parking lots is not the only reasonably foreseeable use of the Project. The Project would also allow Dodger Stadium to be used as a "satellite lot" to allow people to drive to downtown Los Angeles in order to park at Dodger Stadium and use the private gondola to come down from Dodger Stadium to attend events in downtown Los Angeles sports and entertainment venues and to large events at LA State Historic Park. This injection of additional vehicles into the downtown area is also a reasonably foreseeable indirect environmental impact that is not discussed or analyzed in the DEIR.

For example, at a recent meeting of Metro's Ad Hoc 2028 Olympics Committee, the board received a staff presentation explaining how Dodger Stadium parking area had been used as satellite parking for the MLS Cup Final, scheduled at 1pm on Nov. 5, 2022, hours before USC's scheduled home football game at the Coliseum the same day.[36] The MLS Cup Final satellite parking utilized a private shuttle bus service which ran from 9 am to 6 pm. According to Metro, 500 car and 1,500 riders used this shuttle service. If the Project were constructed shuttle buses would not be necessary to move sports event attendees from Dodger Stadium to downtown sports venues, as patrons could use the ARTT LLC private gondola to gain access to Metro's public transit system, whether via trains or bus lines. This foreseeable use of the Project would also draw vehicle traffic to Dodger Stadium that is not accounted for by the Draft EIR.

At the Ad Hoc meeting, public commenter Phyllis Ling noted: "It sounds like you are opening the door to people using Dodger Stadium parking lot as a park and ride lot. That would be – would that be the biggest park and ride lot in the nation? That's a lot of additional Vehicle Miles Traveled into our neighborhood." She also expressed that Metro should learn the lessons from the London and Rio Olympics, which had both built gondolas for their Olympics, and that had not worked out as long-term infrastructure choice for transportation. As Ling stated: "The Rio gondola ran out of money for maintenance and is no longer running. The London gondola has hardly any local riders, it is used mostly for tourism and needs taxpayer funding to support it."[37] As discussed at length above, the federal definition for "public transportation" does not include services used for tourism or "sightseeing," which is specifically excluded from consideration as "public transportation" under federal law. (49 U.S.C. § 5302, subd. (15)(B)(v).)

The Ad Hoc 2028 Olympics Committee meeting presentation also included discussion of an event on October 28, 2018, known locally and nationally as the "Los Angeles Sports Equinox," because games in every major US sports league occurred in Los Angeles on the same day: NFL (Rams), MLB (Dodgers), NBA (Clippers), NHL (Kings), and MLS (Galaxy). If the Project were built, expanded use of Dodger Stadium as a satellite (or park and ride) lot for similar high conflict sports and event days in downtown Los Angeles is a readily foreseeable physical change due to the project and would likewise be expected to draw significant vehicle traffic to Dodger Stadium, increasing greenhouse gas emissions and vehicle miles traveled.

Footnote 36: See excerpts from Metro Ad Hoc 2028 Olympics Committee Agenda – Final, Nov. 16, 2022, agenda item 6, "Mobility Lessons Learned from World Sports Events," as well as p. 11 of a slide presentation presented at that meeting entitled "Major Events Lessons Learned," attached as Exhibit J. Metro presents the audio and video of the Ad Hoc committee's meeting audio/video on its media website: https://metro.granicus.com/player/clip/2413?view_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21 (last viewed Jan 10, 2023). The agenda and related materials are also available at: https://metro.legistar.com/MeetingDetail.aspx?ID=1005579&GUID=696A3208-D9CE-4B9E-8728-977FC65341C8&Options=&Search= (last viewed Jan 10, 2023). The Metro Ad Hoc 2028 Olympics Committee meeting audio/video for this meeting must be made part of the Project's administrative record.

Footnote 37: See link to audio/video, supra fn. 36.

Response GO14-63 The contents of Exhibit J are considered in this response. The comment suggests because Dodger Stadium was used as a park and ride for the MLS Cup final in November 2022, Dodger Stadium may similarly be used for other events. However, this was a unique situation that is not a reasonably foreseeable consequence if the proposed Project were to be constructed and implemented. The scenario described involved Major League Soccer's championship game, the location of which was not scheduled in advance. As the commenters' cited article notes, the Los Angeles Football Club's ("LAFC") Banc of California Stadium was only confirmed as the host of the MLS Cup the Sunday prior to the game, which would occur at the same time as a pre-scheduled University of Southern California football game next door at the Los Angeles Coliseum. This meant that parking within the vicinity for the football game took priority, and LAFC was required to coordinate with and obtain approval from the Los Angeles Dodgers for use of the parking lot. It is highly unlikely that such an event would repeat with any sort of frequency requiring the analysis in the EIR for the proposed Project. Even so, LAFC utilized shuttle buses from Dodger Stadium to the Banc of California Stadium, and there is no indication that the presence of the proposed Project would have increased the likelihood that Dodger Stadium would be used as a parking location for major events. In sum, the proposed Project would connect LAUS to the Dodger Stadium property via an aerial gondola system. The

proposed Project does not contemplate the use of the Dodger Stadium parking lot as a park-and-ride and nor is this use reasonably foreseeable, and accordingly, no such analysis is required. Further, based upon a review of Metro's November 16, 2022, Ad Hoc Olympics Planning Committee meeting, no member of the Ad Hoc 2028 Olympics Committee discussed the potential for using Dodger Stadium as a parking location for the 2028 Olympics. Rather, only a single member of the public raised the possibility during public comment at the meeting. The proposed Project does not contemplate the use of the Dodger Stadium parking lot as a park-and-ride and nor is this use reasonably foreseeable, and accordingly, no such analysis is required.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment GO14-64 Ling's public comment also expressed surprise that the private ARTT LLC gondola project had been placed on Metro's "Comprehensive MCP Project List."[38] Following the close of public comment, in response to Ling's comment, Ad Hoc committee chair, Supervisor Hilda L. Solis questioned its inclusion on the list as well: "You know, just a quick question for staff—I don't recall reading in my materials that the proposed gondola was a part of this. Is that correct?" Metro staff member Ernesto Chaves responded evasively: "It's not part of the prioritized list that is coming up in the next item." But Ms. Ling's comment was not that it was placed on the prioritized list, it was that it was placed on the comprehensive list, which is correct.

The "lessons learned" presentation was followed by discussion of Metro's "2028 Games Mobility Concept Plan." As discussed above, the Project is included on Attachment C to that agenda item. (See fn. 38, this page.) The Project's inclusion on Metro's "Comprehensive MCP Project List" prepared for the Olympics must be construed as a formal acknowledgement by Metro that a reasonably foreseeable

indirect physical change due to the Project is the use of Dodger Stadium parking lots as a satellite lot for Olympics event attendees. The presentation to Metro makes clear that even if Dodger Stadium is not an Olympic venue use of its parking lots for satellite lot use as in the recent MLS Cup Final is an available and perhaps desirable, more important reasonably foreseeable, option for many downtown sports venues where Olympic events will be held.[39] As discussed above, this foreseeable use would draw additional vehicle traffic to Dodger Stadium to utilize the private gondola, which would increase greenhouse gas emissions and vehicle miles traveled, among other potentially significant impacts, thus calling into significant question the DEIR's GHG, VMT, and other conclusions. The DEIR does not address this foreseeable indirect physical change or its potential impacts.

Footnote 38: See Comprehensive MCP Project List, p. 5, attached as Exhibit K. The list is Attachment C to agenda item 7 on the Ad Hoc 2028 Olympics Committee Nov. 16, 2022 agenda; see Exhibit J, supra fn. 36. It is available at http://metro.legistar.com/gateway.aspx?M=F&ID=b8e94467-6e56-4687-b2bc-3d0bb08fb2fa.pdf.

Footnote 39: See Metro presentation, Motion 42 Update: 2022 Prioritized MCP Project List, Nov. 16, 2022, p. 3 (showing a map and list of downtown Los Angele venues), attached as Exhibit L.

Response GO14-64 The contents of Exhibit L are considered in this response. Refer to Response GO14-63 for discussion of how the proposed Project does not contemplate the use of the Dodger Stadium parking lot as a park-and-ride, nor is this use reasonably foreseeable. At Metro's November 16, 2022, Ad Hoc Olympics Planning Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A). The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A).[14] The Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner without any agreement in hand is simply too speculative to require the analysis in the EIR for this aerial gondola system.

Comment GO14-65 Finally, the DEIR discusses that attendees at periodic special events at LA State Historic Park could take the private Project from LA Union Station to the proposed Chinatown/State Park Station, instead of existing public transit options. The DEIR assumes without substantial evidence that it would "capture" 10 percent of such riders. (DEIR, p. 3.17-26.) But the DEIR seems to assume that LASHP special event attendees will come only from the Union Station terminus of the Project. It does not discuss or analyze the foreseeable use of the Project to allow Dodger Stadium parking lots as a potential satellite lot for LA State Historic Park special events which, like other

[14] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

foreseeable uses that would use the Dodger Stadium parking lots for a park and ride or satellite use, would draw additional vehicle traffic to the local community, increasing greenhouse gas emissions and vehicle miles traveled, among other environmental impacts.

Response GO14-65 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response GO14-42 for discussion of the analysis of proposed Project ridership from LAUS to the Los Angeles State Historic Park. Refer to Response GO14-64 for a discussion of how the use of the Dodger Stadium parking lot is not a reasonably foreseeable use required to be analyzed in the Draft EIR, as the Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner without any agreement in hand is simply too speculative to require the analysis in the EIR for this aerial gondola system.

Comment GO14-66 Metro's inexplicable failure to disclose, discuss, and analyze the above foreseeable indirect environmental impacts of the Project cannot be corrected merely by adding additional information in the Final EIR. The purpose of an EIR is to provide the public with detailed information about a project before it is approved (Pub. Res. Code, §§ 21002.1, 21003.1) [W]hen significant new information is added to the EIR after public notice…but before certification, the EIR must be recirculated…" (Pub. Res. Code, § 21092.1; CEQA Guidelines, § 15088.5). The Draft EIR for the Project must be revised and recirculated to address the many deficiencies described in this and other comment letters so that the public has an opportunity to review and provide meaningful comment. Recirculation is required when a DEIR is "so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1130.)

Response GO14-66 This comment and the comments provided in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO14-67 The DEIR's analyses in numerous impact categories is clearly incomplete and deficient for its failure to consider potentially significant impacts of the foreseeable indirect

physical change in the environment caused by likely future development at the Dodger Stadium parking lots or use of the lots as satellite for downtown Los Angeles events. These include the Project's analysis of Air Quality, Energy, Geology and Soils, Land Use and Planning, Noise, Public Services, Parks and Recreation, Transportation and Traffic, and Utilities and Service Systems, among others. Conclusions about greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) are particularly suspect.

Response GO14-67 Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project, which solely proposes an aerial gondola system. Refer to Section 3.03, Air Quality, 3.06, Energy, 3.07, Geology and Soils, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Park and Recreational Facilities, 3.17, Transportation, and 3.19, Utilities, of the Draft EIR, for an analysis of the proposed Project's potential environmental impacts. Conclusions regarding greenhouse gas emissions and vehicle miles traveled are further substantiated by information provided in technical reports; refer to Appendix J, Greenhouse Gas Emissions Technical Report and Appendix N, Transportation Appendices, of the Draft EIR.

Comment GO14-68 In addition, the failure to consider foreseeable indirect impacts completely invalidates the DEIR's Cumulative Impact and Growth-Inducing Impact Analyses. As the DEIR acknowledges: "Secondary effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses." (DEIR, p. 5-57.)

Response GO14-68 Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project, which solely proposes an aerial gondola system. This comment does not specify why the Draft EIR's cumulative impact analysis and growth inducing impact analysis, provided in Section 5.0, Other CEQA Considerations, is otherwise invalid, nor how the cited quote renders the analysis invalid. Indeed, the comment's quotation from the Draft EIR is from the background overview of growth-inducing impacts, and are not related to the analysis of the proposed Project's growth-inducing impacts. Page 5-57 of the Draft EIR also acknowledges that "[g]enerally, growth inducing projects are located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure, such as water or sewer facilities, or roads." The proposed Project's potential growth-inducing impacts analysis is provided on pages 5-58 through 5-60 of the Draft EIR. Pursuant to CEQA section 15130(a), the Draft EIR discussed the cumulative impacts of the proposed Project with other past, present, and probable future projects in Section 5.2, Cumulative Impacts. Pursuant to CEQA Guidelines section 15125.2(d), the Draft EIR provided a discussion

of the ways in which the proposed Project could induce growth in Section 5.4, Growth-Inducing Impacts. Mere speculation from a commenter does not constitute evidence of a foreseeable impact that should have been analyzed, and no revisions to the analysis are required.

Comment GO14-69 Metro has failed to make "a good faith effort at full disclosure" of the Project's environmental effects. (See California Oak Foundation, 188 Cal.App.4th at 262.) The entire DEIR is rendered invalid for its failure to address any impacts from the foreseeable indirect physical changes to the environment likely to be caused due to the proposed Project and must revise and recirculate the DEIR. In the alternative, Metro could instead deny the Project outright. This is the most appropriate course of action since there are superior feasible alternatives that would reduce the Project's significant (and unavoidable) adverse environmental impacts. (See Pub. Res. Code, § 21002: "[P]ublic agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects….")

Response GO14-69 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project, which solely proposes an aerial gondola system. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR of "a good faith effort at full disclosure." Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. In addition, the Draft EIR identifies feasible mitigation measures to substantially lessen identified significant environmental impacts from the proposed Project, in compliance with CEQA's requirements. As discussed in Section 4.0, Alternatives, of the Draft EIR, on page 4-15, pursuant to CEQA Guidelines section 15126.6(f)(2), the Draft EIR considered three Direct Alignment Alternatives which included alternative locations for the proposed Project but dismissed these alternatives from further detailed consideration because they would not avoid or substantially lessen significant effects of the proposed Project, would not otherwise meet the project objectives, and because the Project Sponsor would likely be unable to reasonable acquire, control, or otherwise have access to alternative sites required for the Direct Alignment Alternatives.

Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. In response to public comments, this alternative was considered but dismissed from further detailed analysis in the Final EIR because it did not meet most of the basic objectives of the proposed Project.

Comment GO14-70 II. SUBSTANTIVE COMMENTS ON IMPACT ANALYSES

The following comments are generally presented in the order addressed in the Draft EIR.

A. The Executive Summary is Incomplete and Inaccurate.

Note that some comments associated with the Executive Summary will be made within specific DEIR analysis sections following this section.

Response GO14-70 This comment provides a general introduction to comments raised in this Part II of this letter. Responses to the comments in this section of this letter are provided in Responses GO14-71 through GO14-175.

Comment GO14-71 1. CEQA requires the City of Los Angeles to serve as Lead Agency.

As discussed at length in this office's letter on behalf of LA Parks Alliance of December 19, 2022, LA Park's Alliance objects to Metro's negotiated arrangement to serve as lead agency for the Project. (DEIR, p. ES-1.) The Executive Summary's conclusory analysis that Metro is "the public agency with the greatest responsibility for supervising or approving the project is a whole" is grossly in error. Metro has not documented that it has performed the mandatory analysis pursuant to CEQA Guidelines section 15051 to determine the appropriate lead agency. Had the proper analysis been done, plainly the City of Los Angeles would be designated as the lead agency, not Metro.

Metro's errant conclusion is presented as a fait accompli. This is confusing and misleading to the public (and perhaps also to some agency decisionmakers), most of whom are unlikely to understand that the determination of lead agency must follow the CEQA guidelines. If the CEQA Guidelines were followed the City of Los Angeles would be designated as lead agency, not Metro, for all the reasons discussed in the letter of December 19, 2022.

Designation of the incorrect lead agency prejudicially taints the EIR process, a fatal flaw that can only be remedied by beginning the environmental review process anew with the correct lead agency, here the City of Los Angeles. (See Planning & Conservation League v. Department of Water Resources (2000) 83 Cal.App.4th 892, 907.)

Response GO14-71 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response G014-13 for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro has primary responsibility for implementation of the proposed Project, and is the proper lead agency. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR.

Comment GO14-72 2. The number of Dodger Stadium parking spaces to be removed is not included in the DEIR.

The Executive Summary notes that "[i]mplementation of the Dodger Stadium Station would require the removal of parking spaces," but nowhere does the DEIR detail the number of spaces permanently lost at the stadium due to implementation of the Project. (DEIR, p. ES-10; see also, DEIR, p. 2-39.) The DEIR is incomplete in not including this information.

Response GO14-72 Refer to Section 2.9.7, Dodger Stadium Station, of Section 2.0, Project Description, of the Draft EIR, which states that approximately 194 existing parking spaces would be removed to accommodate the Dodger Stadium Station, the realigned perimeter road, and the pedestrian pathway connecting the station to Dodger Stadium. Parking is not required to be analyzed under CEQA or the City's Transportation Assessment Guidelines ("TAG").

Comment GO14-73 3. Claims of reduced GHG emissions and reduced VMT do not consider reasonably foreseeable indirect physical changes in the environment due to the Project.

The DEIR explains in the Executive Summary and repeats many times throughout that "the proposed Project would reduce vehicle miles traveled (VMT) and congestion, leading to reduced GHG emissions and improved air quality." (DEIR, p. ES-13.) But as discussed above, the DEIR does not consider reasonably foreseeable indirect physical changes in the environment due to the Project, such as development of Dodger Stadium parking lots, or use of those lots as a satellite or "park and ride" lot, which would likely draw many thousands of cars to Dodger Stadium. Thus, all DEIR conclusions regarding GHG, VMT, and many other analysis categories are incomplete and inaccurate and cannot be relied upon.

Response GO14-73 Refer to Responses GO14-57 through GO14-64 for a discussion of how the Draft EIR analyzed all reasonably foreseeable impacts of the proposed Project, which solely proposes an aerial gondola system. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment GO14-74 4. The Executive Summary's "Summary of Public Comments" glosses over neutral and negative comments received during the scoping process.

The Executive Summary's "Summary of Public Comments" improperly mischaracterizes the public comments received during the Project's scoping process by minimizing all negative and neutral comments received. (DEIR, p. ES-17.) The Executive Summary describes the numerous mixed comments in one sentence: "Many community members expressed conditional support for the proposed Project with a strong interest in future Project developments." (Ibid.) This comment seems intended to dissuade DEIR reviewers from bothering to review Appendix A, which includes hundreds of pages of comments, including not only positive and conditionally supportive, but also negative and neutral comments that would likely have informed additional public comment on the DEIR.

California's Supreme Court has held that the environmental review process is intended "to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action." (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376, 392.) "[B]efore project approval, the law presumes the lead agency is neutral and objective and that its interest is in compliance with CEQA. … The agency's unbiased evaluation of the environmental impacts of the applicant's proposal is the bedrock on which the rest of the CEQA process is based." (Golden Door Properties, LLC v. Superior Court (2020) 53 Cal.App.5th 733, 782.)

Metro falls far short of CEQA's goals of transparency, full disclosure, and lack of bias when it grossly mischaracterizes public comments received during the scoping process and uses the DEIR as an advocacy document rather than a neutral, unbiased evaluation of the Project. Because the DEIR must be revised and recirculated (if not entirely discarded) due to its numerous fatal flaws, LA Parks Alliance urges Metro to take the opportunity to remove misleading statements that mischaracterize public comment received in any later environmental review document prepared for the Project.

Response GO14-74 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Contrary to this comment's suggestion, CEQA does not

require the Executive Summary to provide a characterization of all comments received on the NOP. In compliance with CEQA Guidelines section 15123(b)(2), the Draft EIR identified "Areas of controversy known to the Lead Agency including issues raised by agencies and the public" on pages ES-14 through ES-17 of the Executive Summary. Further, refer to Section 1.0, Introduction, of the Draft EIR, for a summary of public comments and questions received during the NOP phase of CEQA review for the proposed Project. Refer to Attachment F in Appendix A, Scoping Report, of the Draft EIR, for copies of all written comments submitted during the public scoping period, a verbatim transcript of the comments received during the meeting, and a verbatim copy of the Q&A Box from the meeting. All comments received during the scoping process for the proposed Project are included in Appendix A to the Draft EIR. Refer to Responses GO14-6 through GO14-12 for discussion of comments received on the NOP. The Draft EIR complied with the requirements of CEQA Guidelines section 15151 to provide information, facts, and analysis to allow decision-makers to make an intelligent decision concerning the proposed Project's environmental consequences. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5

Comment GO14-75 5. The Executive Summary's list of significant and unavoidable impacts is incomplete and inaccurate.

As discussed above, while the California Department of Parks and Recreation clearly has jurisdiction over LA State Historic Park, neither the Department nor the Director have unbridled authority to permit changes to state parkland that would result in a violation of state law. Since the Project may not use any portion of LA State Historic Park for all of the reasons discussed in Parts I(D) and I(E) of this letter (see pp. 12-25), the Executive Summary is incomplete and inadequate for failing to identify that impacts to LA State Historic Park are significant and unavoidable.

Response GO14-75 Refer to Topical Response F, Los Angeles State Historic Park, for discussion regarding how the California Department of Parks and Recreation has the authority to grant the necessary approvals for the proposed Project. Refer to Responses GO14-32 through GO14-54 for responses to comments raised in Parts I(D) and I(E) of this letter. The Executive Summary to the Draft EIR summarizes all potential impacts from the proposed Project set forth in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, in compliance with CEQA. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A

would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO14-76 B. The DEIR's Introduction is Incomplete and Inaccurate.

1. The DEIR fails to identify all trustee and responsible agencies.

As discussed above, Metro failed to include at least two state agencies as trustee and/or responsible agencies. (See Part. I.B., supra pp. 3-7.) As a result, DEIR section 1.3 is incomplete and inaccurate for failing to identify the Santa Monica Mountains Conservancy and California Department of Housing and Community Development. (DEIR, p. 1-2.)

Response GO14-76 Refer to Section 1.0, Introduction, of the Draft EIR for discussion of the CEQA Responsible and Trustee Agencies. Refer to Response GO14-16 for discussion of SMMC and HCD. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the proposed Project's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process.

Comment GO14-77 2. The DEIR misidentifies the Project as eligible for SB 44.

The DEIR's SB 44 analysis of the Project concludes that it is eligible for SB 44 streamlining as an environmental leadership transit project. (DEIR, pp. 1-4 to 1-9). However, this conclusion is incorrect for all the reasons discussed above (primarily because the project is not "public transportation" and therefore cannot be considered a "fixed guideway"). (See Part I.C., pp. 8-12.) In addition to objections already raised, the DEIR's SB 44 analysis is also vague, inaccurate, and misleading.

First, although the Project is only 1.2 miles in length (DEIR, p. ES-1), the DEIR states: "For the purposes of SB 44, this Draft EIR defines the 'corridor of the project' as the area in which Dodger fans travel to and from games at Dodger Stadium, based on existing ticket sale data." (DEIR, p. 1-4.) The DEIR is vague and ambiguous in not explaining why the "corridor of the project" is so much greater than the actual project area and suggests that the Project takes credit for GHG and VMT reductions not associated with the Project. The response to DEIR comments should explain why the

"corridor of the project" can be so vast when compared to the small actual corridor the proposed Project would occupy if constructed.

Response GO14-77 Refer to Response G014-22 for discussion of how the proposed Project complies with SB 44. As discussed in Section 1.4.3, Senate Bill 44, of the Draft EIR, the "corridor of the project" for purposes of SB 44 is "the area in which Dodger fans travel to and from games at Dodger Stadium, based on existing ticket sale data." As explained in Section 3.17, Transportation, of the Draft EIR, VMT for the proposed Project ridership forecasting model is calculated by multiplying the number of vehicle trips by the average trip length, and average trip length is calculated using Teralytics data of approximately 2.1 million trip samples to calculate average trip lengths for weekday games (19-21 miles) and weekend games (22-25 miles). As demonstrated in Appendix N, Transportation Appendices, of the Draft EIR, in the "LA ART Mode of Access Data Considered and Estimated Future Mode of Access" table, the proposed Project ridership forecasting model assumes that 67.5 percent of riders for the proposed Project will take public transportation to LAUS to access the proposed Project via Alameda Station. The methodology for these ridership estimates is explained in detail in Section 3.17, Transportation, of the Draft EIR, on pages 3.17-24 to 3.17-26. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[15] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment GO14-78 As discussed above, the DEIR's calculation of GHG and VMT reductions do not include consideration of reasonably foreseeable indirect physical changes in the environment (foreseeable development at Dodger Stadium parking lots as well as use of the lots for satellite parking), and therefore information provided in support of the DEIR's SB 44 analysis of GHG and VMT is inaccurate and must be recalculated. (See DEIR, pp. 1-5 to 1-6, 1-8.) This claim is made repeatedly throughout the DEIR.

Response GO14-78 Refer to Responses GO14-57 through GO14-64 for a discussion of how the Draft EIR analyzed all reasonably foreseeable impacts of the proposed Project, which solely proposes an aerial gondola system.

Comment GO14-79 The DEIR's consistency analysis with the Goals of Connect SoCal is inaccurate. For example, the second goal is met in part "by reducing passenger vehicle miles traveled." (DEIR, p. 1-6.) As discussed above, the VMT calculations are incorrect due to the DEIR's failure to consider reasonably foreseeable indirect physical changes in the environment due to the Project. Likewise, the fifth and seventh goals are met in

[15] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

part by assuming a reduction in net GHG due to the Project, which is also calculated without considering reasonably foreseeable indirect physical changes in the environment due the Project. (DEIR, pp. 1-6, 1-7.) The Project meets the sixth goal by relying on an entirely speculative "potential mobility hub" at Dodger Stadium, which would allegedly increase access to Elysian Park and surrounding communities. (DEIR, p. 1-7.)

The DEIR's analysis of consistency with the eighth listed goal states that it would "leverage new transportation technologies and data-driven solutions that result in more efficient travel." (Ibid.) There is no evidence presented in the DEIR to support this pie-in-the-sky consistency conclusion—the conclusory statement is no more than unabashed cheerleading in support of the Project.

Response GO14-79 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 1.0, Introduction, of the Draft EIR, pages 1-6 to 1-8, and Appendix N, Transportation Appendices, of the Draft EIR, for analysis of the proposed Project's consistency with each of the goals of Connect SoCal. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with the goals of Connect SoCal, as the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities, and would otherwise reduce greenhouse gas emissions by reducing VMT. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. As discussed in Section 5.0, Corrections and

Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Thus, the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities. The proposed Project would reduce greenhouse gas emissions by reducing VMT. Accordingly, the proposed Project would be consistent with goals in Connect SoCal and is thus consistent with the applicable sustainable communities strategy and regional transportation plan, satisfying Public Resources Code sections 21168.6.9(a)(1)(D)-(E).

Comment GO14-80 The DEIR's analysis of consistency with Connect SoCal's ninth goal suggests that the Project will encourage housing growth. (Ibid.: "The proposed Project would encourage development of diverse housing types.") While LA Parks Alliance believes this statement is likely true, since the DEIR fails to consider the growth-inducing impacts of the reasonably foreseeable indirect physical changes to the environment due to the failure to address future development at Dodger Stadium (which could not only include housing, but also would likely increase the number of permanent jobs in the region, which would induce housing demand), it is completely at odds with the DEIR's later conclusion that the Project will not promote any growth in housing, whether directly or indirectly. (DEIR, p. 5-58.) The Project cannot both encourage housing while not directly or indirectly inducing growth. Metro needs to explain this internal inconsistency.

Response GO14-80 Refer to Response GO14-79 for a discussion of the proposed Project's consistency with each of the goals of Connect SoCal. Refer to Response GO14-68 for a discussion of the proposed Project's growth-inducing impacts analysis. Further, this comment mischaracterizes Goal Nine of Connect SoCal, as well as the Draft EIR's analysis of the proposed Project's consistency with this goal. In full, the Goal states: "Encourage development of diverse housing types in areas that are supported by multiple transportation options." As discussed on page 1-7 of the Draft EIR, the proposed Project is consistent with this goal "by providing an additional transportation option for the residents and visitors in the City of Los Angeles, and enabling access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS." Therefore, the proposed Project is consistent with this goal for its ability to provide a transit connection, not housing. Further, as discussed in Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, Goal Nine is "not applicable to an individual transportation project." Accordingly, the Draft EIR is not "internally inconsistent" in its discussion of the potential for growth-inducing impacts. Refer to Topical

Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment GO14-81 The DEIR's analysis of consistency with the tenth and final Connect SoCal goal states that the Project "would promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area, and would not impede the region's goal of conserving land and restoring habitats." (DEIR, p. 1-7.) This is an outrageous conclusion given that the Project seeks to use well over an acre of the Los Angeles State Historic Park for a significant portion of its alignment and would require 81 trees in and adjacent to the Park to be destroyed. On this basis alone, it is evident that the Project does not "promote conservation of natural…lands and restoration of habitats." Further, and as discussed below, removal of 81 trees and Project-related activity at the western side of the Park removes habitat, and the Project's gondola cable system will likely result in deadly bird strikes. These significant impacts do not "promote conservation."

Response GO14-81 Refer to Section 1.0, Introduction, of the Draft EIR, for the proposed Project's analysis of consistency with Connect SoCal's goals, including to promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area, and to not impede the region's goal of conserving land and restoring habitats. Further, as discussed in Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, Goal Ten is "not applicable to an individual transportation project," but nevertheless, the proposed Project "would promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area," and therefore "would not impede the region's goal of conserving land and restoring habitats." Therefore, the proposed Project is consistent with Goal Ten. Refer to Section 3.04, Biological Resources, with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR, for a discussion of how the proposed Project would have less than significant impacts to biological resources with mitigation. This conclusion is further substantiated by Appendix G, Supplemental Biological Resources Report, of this Final EIR. As discussed in Appendix G, while the removal of the relatively small amount of wooded habitat for the proposed Project would result in a marginal reduction of suitable tree habitat in the short-term, in the long-term, the replacement of the trees proposed in connection with the applicable tree replacement requirements (and memorialized in BIO-PDF-F) would more than offset any realized impacts associated with the proposed Project. In addition, in order to provide additional environmental benefits, the proposed Project would implement

BIO-PDF-A through BIO-PDF-H. BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction that are not identified to be removed, but are either in the construction footprint, or in close proximity to the construction footprint, is discussed in Section 3.04 of the Draft EIR. BIO-PDF-B through BIO-PDF-H are discussed in Section 5.0, Corrections and Additions, of this Final EIR.

As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Responses GO14-134 through GO14-141 for discussion of the Draft EIR analysis of risk of avian collision.

Comment GO14-82 C. The Project Description Minimizes Project Impacts, Includes Artificially Constrained Project Objectives, and is Inaccurate, Incomplete and Misleading.

1. The project description of Los Angeles State Historic Park minimizes aesthetic, cultural, historic, and other Project impacts.

The DEIR provides general descriptions of major landmarks within the alignment of the proposed Project. Section 2.3.4 of the DEIR's Project Description provides information about Los Angeles State Historic Park. The bland description of LA State Historic Park greatly undervalues its importance as a treasured resource within both the local community it serves and to the people of California more generally.

LA State Historic Park's name was specifically chosen "in an effort to support the broad interpretive purpose of the Park in telling the whole cultural story of Los Angeles." (LASHP General Plan, p. 10 (emphasis added).)[40] As LA State Historic Park's General Plan states:

> Who are Angelenos? What is Los Angeles? As noted, historian Dr. Leonard Pitt stated, "No other available 32 acres holds as much opportunity to enlighten us

about the history and culture of Los Angeles and this region…" The Park site and its surroundings have a sense of place rooted in a long history of settlement. There are opportunities for discovery and revelation based on the untold stories, some contained in the remnant material culture of the site. The tangible resources today appear to be few, but we can still hear the whispers of the past resonating in the voices of the present, proclaiming the future of the area. … [¶]

The site has been the crossroads and hub for many peoples in the past and is still in a transportation corridor that is connected to the larger region by rail, the nearby river, and major thoroughfares. It has been the scene of discovery, adventure, and tragedy. Struggles and triumphs were part of the changing landscape of the people passing through, moving in, moving out, forced out, and returning. It is the core of a town that grew to a megalopolis with global influence that was, and still is, often veiled in myth and controversy.

On the other hand, the Park is nestled into the heart of Los Angeles' urban core surrounded by clusters or pockets of identifiable neighborhoods and communities that have long rooted connections to the history of the city. While intimately connected to the surrounding dense urban development, the open space of the 32 acres of this site will be able to provide escape from the structure and pace of urban life.

(LASHP General Plan, pdf. p. 9 ("Sense of Place").)

Footnote 40: California Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report (hereafter "LASHP General Plan"), 2005, available at: https://www.parks.ca.gov/pages/21299/files/LASHP%20General%20Plan-EIR.pdf.

Response GO14-82 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. The planning, developing, and efforts made by State Parks and its partners resulted in a park that provides the "a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles" for the surrounding community, greater Los Angeles, and visitors from around the world, one that the proposed Project is designed to honor and expand upon. Pursuant to CEQA Guidelines section 15124, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. Section 2.0, Project Description, of the Draft EIR, included a description of all integral components of the proposed Project for the environmental analysis, enabling Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, to fully analyze and disclose all impacts of the proposed Project, and Section 4.0, Alternatives, of the Draft EIR, to consider potential alternatives to the proposed Project. Section 2.0, Project Description, of the Draft EIR

contains the specific descriptions of the proposed Project required pursuant to CEQA Guidelines section 15124, including a description of the proposed Project's location (Draft EIR, § 2.3), a statement of the project objectives, including the underlying purpose of the proposed Project (*id*., § 2.3.8), a description of the project's technical and environmental characteristics (*id*., §§ 2.2, 2.4 to 2.9), a discussion of the intended uses of the EIR (*id*., § 1.2), and a list of the project approvals that will be required (*id*., § 2.10). Pursuant to Section 15165 of the CEQA Guidelines, each component of the proposed Project, e.g., each station, tower, and junction, are identified within the Draft EIR and their impacts analyzed. In addition, Section 2.0, Project Description recognizes that the proposed Project will serve different types of riders, noting that in addition to providing an aerial rapid transit option for visitors to Dodger Stadium, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Section 2.0 also recognizes the ancillary features of the proposed Project, including pedestrian improvements, amenities at the Los Angeles State Historic Park, and mobility hubs at both the Chinatown/State Historic Park Station and Dodger Stadium Station. The Project Description in the Draft EIR includes 62 pages of detailed descriptions of the whole of the action considered as part of the Project. In turn, the Draft EIR fully analyzes and discloses the potential environmental impacts of this proposed Project, providing mitigation as necessary for potentially significant impacts. CEQA does not require the Project Description to include the level of detail regarding surrounding "landmarks" that this comment requests.

Comment GO14-83 One of LA State Historic Park's major features, identified by its General Plan as an "aesthetic resource," is its iconic view of the City of Los Angeles. (Id., p. 38.) "As viewed from the north, especially from the northern two-thirds of the property, the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. Sometimes referred to as the 'front porch' of the City, *there are no other sites that capture this welcoming view of downtown Los Angeles*." (Ibid. (emphasis added).)

LA State Historic Park's General Plan's Final EIR includes Mitigation Measure Aes-1 to protect this "front porch" view of the Los Angeles skyline. It requires that those necessary facilities to be constructed at LA State Historic Park "[i]mplement design practices that reduce the overall negative aesthetic effect of new facilities." (Id., p. 122.) These design practices include use of vegetation to screen negative views, incorporating architectural site/design elements consistent with the plan, limit and direct lighting downward, and evaluating the location of structures to enhance positive views from and of the Park. (Ibid.)

The DEIR description of the iconic "front porch" viewshed states only that "[v]iews of downtown Los Angeles are available from the majority of the site." This bland description seems calculated to minimize the importance of protected views of downtown Los Angeles from LA State Historic Park, and to set the table for later

minimization of the Project's significant aesthetic impacts on the Park, which are discussed further below.

Response GO14-83 Refer to Response S2-5 discussing how the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan mitigation measure Aes-1. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including on the Los Angeles State Historic Park, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project in response to comments on the Draft EIR, including at Los Angeles State Historic Park. Refer to Response S2-5 for a discussion of the proposed Project' s consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO14-84 2. The project description of Dodger Stadium is incomplete.

The DEIR's one-paragraph description of Dodger Stadium is accurate, but incomplete.

The DEIR's description of Los Angeles Union Station explains the LA Union Station Master Plan "encompasses approximately 38-acres" [sic]. (DEIR, p. 2-7.) The DEIR's description of El Pueblo de Los Angeles notes that its Historic District has an area of approximately 9.5 acres. (DEIR, p. 2-8.) The DEIR's description of Los Angeles State Historic Park states that it "comprises 32 acres of open space." (DEIR, p. 2-9.)

The DEIR's description of Dodger Stadium notes the date it opened, its street address, where it is located, its seating capacity, its location relative to local freeways, and the neighborhoods located around it.

But the DEIR does not mention that Dodger Stadium is surrounded by 260 acres of parking lots. This is a curious omission, given that one of the DEIR's fatal flaws is its failure to discuss or analyze the reasonably foreseeable indirect physical change in the environment likely to occur due to the Project: the development of some portion of the 260 acres of parking lots surrounding the stadium. (See discussion Part I(G), supra pp. 26-34.)

Response GO14-84 Refer to Section 2.0, Project Description, of the Draft EIR, which includes a description of Dodger Stadium and the surrounding area, stating that Dodger Stadium is directly surrounded by surface parking. Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts. Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project, which solely proposes an aerial gondola system.

Comment GO14-85 3. The Project Purpose and Need section is incomplete and misleading.

The DEIR includes a brief discussion describing the need and alleged purpose of the Project. (DEIR, pp. 2-10 to 2-12.) It explains that with the potential ability to move 10,000 people within two hours prior to the start or after a game or event at Dodger Stadium, and with average Dodger Game attendance of approximately 49,000 people, the private gondola could transport approximately 20,000 fans to Dodger Stadium. (DEIR, p. 2-12.) This assertion suggests that the gondola would operate at essentially maximum capacity right out of the gate.

But the question is not how many people could use the gondola, it is how many would.

The DEIR states that if immediately constructed and operational in 2026, the initial average ridership to attend Dodge Games would only be 6,000 fans. (DEIR, pp. 3.17-34 to 3.17-35.) The Project Description is thus very misleading, grossly

overstating the initial Dodger Stadium game ridership as potentially more than even the DEIR claims—not approximately 20% of fans, but approximately 12% (that is, if the many DEIR assumptions regarding ridership are accurate).

Moreover, the DEIR's ridership assumptions are that 100% of gondola users will use it both for arriving to and departing from Dodger Stadium. (DEIR, p. 3.17-24). But there is no chance this unsupported assumption is correct. A healthy person could walk from Dodger Stadium to Union Station in far less than the two hours it would take to transport 10,000 fans there. According to the Google Maps direction tool, a walk from Dodger Stadium to Union Station (which is flat or downhill the entire way), would take 35-37 minutes, depending on the precise route chosen.[41] The DEIR estimates that 15% of riders would transfer from the Metro Gold line at its Chinatown Station. (DEIR, p. 3.17-24.) This is a considerably shorter walk from Dodger Stadium than to Union Station, only 1.2 miles, and would take only 25 minutes.[42]

Footnote 41: Exhibit M is a Google Map page created January 9, 2023, showing two walking routes from Dodger Stadium to LA Union Station, both of approximately 1.8 miles, estimated to take between 35-37 minutes.

Footnote 42: Exhibit N is a Google Map page created January 9, 2023, showing walking routes from Dodger Stadium to the Metro Gold line Chinatown Station, the shortest of which is 1.2 miles, estimated to take approximately 25 minutes.

Response GO14-85 This comment provides a general recitation and characterization of the Draft EIR. This response takes into consideration the content of Exhibits M and N to this comment. Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirements for the project description, including the statement of objectives (describing the underlying purpose of the proposed Project). Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close

to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for a discussion of the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. As discussed in the Draft EIR, the proposed Project's ridership is anticipated to increase from 6,000 riders in the proposed Project's Opening Year (2026) to 10,000 riders in the proposed Project's Horizon Year (2042). (See, e.g., Draft EIR, § 3.17, p. 3.1-34.) Topical Response B also discusses how while there are some game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on the proposed Project, and the path would be on a steep downward grade which does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility.

Refer to Topical Response N, Environmental Justice, for a discussion of the proposed Project is designed to be ADA compliant. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins allow for sitting or standing, and would be fully ADA accessible, including accommodating wheelchairs. In addition, the length and sizing of the arrival/departure platforms within station would be compliant with the accessibility requirements of the ADA. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment GO14-86 For those who would not choose to wait for their turn in a post-game gondola line who cannot or prefer not to walk to the nearest Gold Line station or to Union Station, many would likely use another available alternative than stand and wait for an hour or more. Other options include a rideshare service such as Uber or Lyft, the Dodger Stadium Express bus (assuming it is still in operation), or a shorter walk to an

intermediate location, for example Sunset Boulevard, to take a rideshare vehicle or other public transportation from there.

As Metro's precursor agency (Los Angeles County Transportation Commission) learned from the August 1990 Gruen Associates report, a gondola tramway alternative offers the lowest capacity of typically available people mover technologies, and therefore the greatest waiting times compared to other technology options.[43] Metro seems to have forgotten the earlier study. While the 1990 gondola option was a slightly different technology and route than the currently proposed Project, its conclusions comparing the relative waiting time among people moving technologies remains valid. The LACTC Study amplifies two important points ignored by the Project's DEIR:

- Gondola boarding wait times far exceed wait times for other options
- Proper transportation planning requires consideration of not only the time it takes for the technology to deliver passengers from one point to another, but the total amount of time spent waiting/boarding and traveling.[44]

As the LACTC Study notes, "[a]ny transit technology must accommodate a peak loading phenomenon where up to 56,000 persons enter or leave [Dodger] Stadium within a brief period of time before or after events." (LACTC Study, p. iii.) But the DEIR never discusses the total time between Union Station and Dodger Stadium including both waiting and travel time. It only ever discusses the brief travel time. (See, e.g., DEIR, pp. ES-1, ES-3, 1-1, 2-1, 2-12, 2-42, 3.11-54, 3.11-55, 5-59.) The DEIR discusses queueing areas, but not queueing times. 10,000 patrons cannot all occupy one 30-40 passenger gondola cabin. At a rate of only 5,000 passengers per hour, if the gondola is as popular as projected (and no substantial evidence supports that it will be) the last gondola would leave Dodger Stadium approximately two hours after conclusion of a game or special event. The DEIR assumes 100% round trips (DEIR, p. 3.17-24) but fails to consider that not all patrons will be willing to wait that long. The LACTC Study, completed more than 30 years ago, did not make this fundamental error.

Footnote 43: Gruen Associates, Dodger Stadium Transit Access Study prepared for the Los Angeles County Transportation Committee (hereafter LACTC Study), Aug. 1990, pp. iii-iv, attached as Exhibit O.

Footnote 44: See LACTC Study, supra fn. 43, p. 30.

Response GO14-86 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation. As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. Nevertheless, refer to Topical Response B for discussion of how post-game queues at Dodger Stadium were estimated based on

assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. As detailed in Topical Response B the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. This is in contrast to the Dodger Stadium Express, which has much longer gaps in bus departures (from a minimum of 3 minutes to a maximum of 19 minutes spacing between bus departures based on 2023 season observations further described in Topical Response B) leading to static queues that build substantially over time as departure frequency is substantially less frequent than the proposed Project. Additionally, based on 2023 season observations, the service time from the first bus departure to the last bus departure for the Dodger Stadium Express was nearly 2 hours, with the last bus departing up to 90 minutes after the end of the game. Once all Dodger Stadium Express buses in operation depart for LAUS post game, headways spaced out due to traffic congestion and overall run time between Dodger Stadium and LAUS. The longest time between bus departures was observed to be 19 minutes. During this 19 minute time period, the passenger queue either remained static, or grew as additional riders entered the queue following their exit from Dodger Stadium.

In contrast, within the same approximately 1/3 of an hour between Dodger Stadium Express departures at its longest headway, the proposed Project could serve approximately 1,667 passengers on average (5,000/3=1,667), which is approximately 90 percent (1,667/1,840) of the average 2019 season one-way passenger load of 1,840 carried by the Union Station Dodger Stadium Express in total for an entire game.

Refer to Topical Response B for discussion of other modes of transit, including the Dodger Stadium Express, rideshare, and walking. The Draft EIR does not assume 100% round trips during a Dodger game. As discussed in Topical Response B, the ridership modeling for the proposed Project took into account that post-game/event ridership on the proposed Project would be less than pre-game ridership and incorporated the expected drop in post-game ridership compared to pre-game that is seen today for the Dodger Stadium Express. These post-game riders who do not make a return trip were assumed to switch to vehicle modes to ensure a conservative VMT analysis.

As described in Section 2.0, Project Description, of the Draft EIR, the two primary types of aerial transit used in urban environments are tramways and detachable

gondolas. As shown in Table 1 of the 1990 *Dodger Stadium Transit Access Study* (1990 Study) referenced in the comment and attached as Exhibit O to this letter[16], the gondola technology evaluated in that study was a reversible tramway system consisting of two 125-passenger cars, similar to the Portland Aerial Tram in Portland, Oregon and the Roosevelt Island Tramway in New York, New York. An aerial tram system typically has two cabins that shuttle back and forth between two end terminals. The proposed Project is a detachable gondola system. An aerial gondola system includes multiple cabins that travel on a continuously circulating cable, which allows for an overall higher system capacity and ability to move more people per hour in each direction than an aerial tram. Furthermore, the proposed Project would be a modern 3S system with the capacity to move approximately 5,000 people per hour per direction with a travel time from LAUS to Dodger Stadium of seven minutes, far greater than the 2,800 persons per hour capacity estimated in the 1990 Study for the two-car reversible tramway system. As such, the two systems are not comparable, and findings in the 1990 Study comparing the tramway system to other modes as analyzed in that 33-year-old study are not relevant to the current proposed Project.

Refer to Response GO14-84 for a discussion of the need for the proposed Project. In addition, although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. As discussed in Appendix D of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment GO14-87 Also entirely missing from the project description's statement on the proposed Project's alleged purpose and need is any discussion of future development at Dodger Stadium. As discussed at length above, public reporting on potential development of the Dodger Stadium parking lots has been in the public realm for well over a decade, and was noted repeatedly during the Project's scoping process, yet is entirely ignored in the project description's discussion of the Project's purpose. (See discussion, supra pp. 26-33.) The effort to remove vehicles from local roadways is not likely to be significant (see UCLA Mobility Lab study, infra fn. 46). But removal of a significant number of vehicles from Dodger Stadium parking lots is likely to free up space in those

[16] Gruen Associates. 1990. Dodger Stadium Transit Access Study. Available at: https://libraryarchives.metro.net/dpgtl/lactc/dodger_stadium_access_study.pdf. Accessed August 2023.

parking lots for the foreseeable development described in the many articles attached to this comment letter. (See Exhibit I, supra fn. 34.)

The Project Description's purpose and need section is misleading and incomplete. It omits the expected travel time between Union Station and Dodger Stadium, leaving out the very lengthy expected wait times for passengers who would use it to attend Dodger games and events, and assuming all passengers would both arrive and depart via the private gondola, as opposed to arriving via the gondola and departing by some other means. And it fails to acknowledge that the alleged goal of removing passenger vehicles from local roadways would also coincidentally remove them from the Dodger Stadium parking lot, freeing up some portion of those lots for long-planned development as earlier described.

Response GO14-87 Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts. Refer to Responses GO14-56 to GO14-66 for a discussion of how the Draft EIR considered all reasonably foreseeable potential impacts associated with the proposed Project, which solely proposes an aerial gondola system.

Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Refer to Response GO14-85 for discussion of how the description of the proposed Project's purpose and need in Section 2.0, Project Description, of the Draft EIR, is in compliance with CEQA. Refer to Response GO14-86 for discussion of queuing at stations and pre-game and post-game transportation, and other modes of transportation. Refer to Topical Response B, Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation, for discussion of how four post-game time periods during the 2023 season were observed to quantify the existing service time needed to transport Dodger Stadium Express riders. As noted therein, the service time from the first bus departure to the last bus departure was nearly 2 hours,

with the last bus departing up to 90 minutes after the end of the game. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its much slower travel time and much longer wait time between buses compared with the proposed Project, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service and substantially higher capacity.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Appendix N, Transportation Appendices, of the Draft EIR, which details ridership model inputs, including passenger transfer wait times.

Comment GO14-88 4. The Project Objectives are artificially constrained to favor the preferred project alternative.

An EIR's project description must contain a "statement of the objectives sought by the proposed project." (CEQA Guidelines, § 15124 subd. (b).) The purpose of providing a statement of objectives is to "help the lead agency develop a reasonable range of alternatives to evaluate in the EIR" and to "aid the decision makers in preparing findings or a statement of overriding considerations, if necessary." (Ibid.; see also CEQA Guidelines, § 15126.6(c): "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.") An EIR's alternatives section, informed by the statement of objectives, is part of the very "core of the EIR." (In re Bay-Delta etc. (2008) 43 Cal.4th 1143, 1162.)

Project objectives may not define a project so narrowly "as to preclude any alternative other than the Project." (We Advocate Thorough Environmental Review v. County of Siskiyou (hereafter WATER) (2022) 78 Cal.App.5th 683, 692.) "[I]f the principal project objective is simply pursuing the proposed project, then no alternative other than the proposed project would do. All competing reasonable alternatives would simply be defined out of consideration." (Ibid.) The statement of project objectives for the proposed Project charts just such an unlawful course.

The project objectives start with a recitation of the Project's overall purpose, which has at least three or four separate "overall" purposes embedded within it:

> The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS.

(DEIR, p. 2-12.)

Here, a reasonable and sensible "overall" purpose could very well be providing a direct transit connection between LAUS and the Dodger Stadium property. That is but one overall purpose. Must that overall purpose limit feasible projects to those that are "an aerial gondola system?" Must it also "improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park," or is that merely a clever rationale to justify taking well over an acre of LA State Historic Park for a commercial, private transit system?

Response GO14-88 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The proposed Project's objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree." (CEQA Guidelines, §15126.6(a)–(b).) The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium. . Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required

clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project.

Comment GO14-89 The list of bullet-pointed project objectives that follow the DEIR's initial "overall purpose" statement includes several impermissible objectives that are plainly intended to define out of consideration competing reasonable alternatives, limiting the number of reasonable alternatives considered. (See WATER, 78 Cal.App.5th at 692.) These include (objectionable wording is emphasized with italicization, with some parenthetical commentary):

Attract new transit riders to the Metro system through a *unique experience of an aerial transit system* connecting to Dodger Stadium. (Attracting new Metro riders through a Dodger Stadium connection need not be via aerial transit—this objective unnecessarily precludes feasible alternatives.)

Improve the Dodger Stadium visitor experience by providing *efficient, high-capacity, and faster alternative* access to Dodger Stadium. (Since the DEIR fails to include data on queueing times, it is unclear whether the preferred alternative meets this objective.)

Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area. (Based on a report prepared for the Project proponent, many gondola users are likely to drive downtown to take the gondola, and others are likely to use rideshare services before and/or following the game.[45] It is thus unclear how well the preferred alternative meets this project objective, if at all.)

Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. (See preceding comment—it is unclear how well the preferred alternative meets this project objective; foreseeable indirect physical changes due to the preferred alternative would also draw additional vehicles to the Project area not considered.)

Improve transit rider experience *by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans*. (This objective unnecessarily precludes feasible alternatives.)

Bring a world class aerial transit system to the Los Angeles area. (This objective unnecessarily precludes feasible alternatives.)

Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, *including the Los Angeles State Historic Park* and Elysian Park. (This objective is an attempt to justify use of public parkland for the benefit of the Project, which is impermissible under California law. See discussion, supra pp. 12-26).)

Identify comparable, affordable, and accessible fare opportunities for community and *Los Angeles State Historic Park* and Elysian Park access. (See preceding comment. LA State Historic Park is already well-served by public transit.)

Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project. (Building a project out of sustainable materials does not minimize its aesthetic, cultural, historic, and other significant impacts. This project objective is far better met by the environmentally superior alternative, which requires little, if any, permanent infrastructure to be built along the Project's 1.2-mile-long corridor, and has no meaningful aesthetic, cultural, historic, or other impacts.)

Provide a sustainable form of transit by *operating the ART system* with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. (The objective assumes an aerial rapid transit (ART) system, which unnecessarily precludes feasible project alternatives.)

Maximize the Project's alignment along the public ROW and *publicly owned property and minimize aerial rights requirements* over private properties, taking into account existing and future adjacent land uses. (The objective assumes an aerial rapid transit system, which unnecessarily precludes feasible project alternatives, and fails to distinguish between publicly owned property that is and is not preserved as public parkland.)

The above parenthetical objections illustrate how a substantial number of project alternatives are unnecessarily precluded by the DEIR's artificially narrow project objectives, which were plainly crafted to favor the preferred alternative aerial rapid transit system over other feasible alternatives to transport Metro riders from LA Union Station to Dodger Stadium with a stop at (within) LA State Historic Park to attempt to justify use of public parkland for the benefit of the Project.[46] It is improper to take an artificially narrow approach in crafting project objectives to ensure that the results of an alternatives analysis is only "an empty formality." (WATER, 78 Cal.App.5th at 692.)

Footnote 45: See Fehr & Peers, Los Angeles Aerial Rapid Transit Project–Parking Study (Sept. 2022 Draft), pp. 8-9. This document is already part of the administrative record for the Project, and is available at: https://www.dropbox.com/sh/trfpt09to0kp4a8/AACpn7RaYP9KN2zG7ncfAYt6a/Documents/LA%20ART%20Parking%20Study?dl=0&subfolder_nav_tracking=1.

Footnote 46: If the fundamental Project goal were to remove passenger vehicles from local roadways, there would be no proposed intermediate Chinatown/State Park Station, which encourages parking on local streets in Chinatown and at and near LA State Historic Park. Instead, gondola passengers could take the Gold Line one stop to Union Station and queue for the gondola at its Union Station terminus. This

alternative is not studied in the DEIR, perhaps because with no justification for use of LA State Historic Park's airspace, the preferred alternative is actually not feasible.

Response GO14-89 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Refer to Response G014-88 for discussion of how the proposed Project's objectives are consistent with CEQA and do not unnecessarily preclude feasible project alternatives.

The potential for other types of transit connections to attract new riders to the Metro system was studied in the Draft EIR and Final EIR, including the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express, and the Pedestrian Enhancement Alternative. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of how the Pedestrian Enhancement Alternative studied in the Final EIR would have a travel time of at least nine times greater than the three-minute travel time between the Metro L Line (Gold) Station and Dodger Stadium, and would thus be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and physical exertion up the hill.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in

traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.. In addition, refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Refer to Responses GO14-45 through GO14-50 for discussion of the proposed Project's compliance with the Public Park Preservation Act.

The proposed Project would improve community access to the Los Angeles State Historic Park by providing an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Refer to Responses GO14-158 and GO14-161 for discussion of public transit options for Los Angeles State Historic Park. Further, as discussed Section 2.0, Project Description, of the Draft EIR, the proposed Project could also provide pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge to improve access from North Broadway to the park. These features of the proposed Project would improve access to the Los Angeles State Historic Park.

As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, of the Draft EIR, the proposed Project would have less than significant operational impacts. As discussed in the Executive Summary to the Draft EIR, the proposed Project would result in significant and unavoidable impacts only with regard to Construction Noise and Vibration

(human annoyance). All other construction impacts identified as significant in the Draft EIR would be reduced to less than significant with implementation of mitigation measures. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The TSM Alternative would not meet this objective because it would have higher VMT and therefore air quality and GHG emissions in comparison.

Comment GO14-90 LA Parks Alliance notes that it is the lead agency, not the project proponent, that is responsible for a project's environmental document. (Pub. Res. Code, § 21067; CEQA Guidelines, § 15050.) The proposed project objectives provided here by Metro suggests a strong precommitment to the proponent's preferred aerial tram alternative. (See Save Tara v. City of West Hollywood (2008) 45 Cal.4th 116, 138-139: an agency must not commit itself to particular project features "so as to effectively preclude any alternatives or mitigation measures that CEQA would otherwise require to be considered…"; see also CEQA Guidelines, 15126.6, subd. (e).)

Response GO14-90 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Refer to Response G014-88 for discussion of how the proposed Project's objectives are consistent with CEQA and do not unnecessarily preclude feasible project alternatives. The case that this commenter cites is inapplicable to the proposed Project. The adoption of project objectives as required by CEQA does not constitute a pre-commitment to a project.

Comment GO14-91 The DEIR's project objectives have been artificially narrowed to favor an aerial tram alternative and should be re-crafted so as not to unnecessarily preclude other alternatives that feasibly attain most of the basic objectives of the project (focused on moving passengers from Union Station, and perhaps other locations, to Dodger Stadium) and avoid or substantially lessen the significant effects of the Project.

Response GO14-91 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Refer to Response G014-88 for discussion of

how the proposed Project's objectives are consistent with CEQA and do not unnecessarily preclude feasible project alternatives. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, of the Draft EIR, the proposed Project would have less than significant operational impacts. And, as discussed above, increased bus service from remote locations around Los Angeles County to and from Dodger Stadium would add to rush hour traffic and congestion.

Comment GO14-92 5. The Project alignment diagrams provide insufficient detail.

Illustrations of the proposed Project alignment found in the DEIR's project description are insufficient to allow interested members of the public to evaluate the alignment. Figure 2-7 (entitled "ANSI Requirements and Additional Separation Buffer") and Figure 2-8 (entitled "Proposed Alignment Over Public ROW/Publicly-Owned Property

and Private Property") each use one page to show the entire Project alignment. (DEIR, pp. 2-20 to 2-21.) While they provide a generalized view of the proposed Project location, zooming in does not provide interested community members (or decisionmakers) sufficient detail to understand the alignment's proximity to nearby buildings and other structures.

Response GO14-92 Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts. Section 2.5.1 of Section 2.0, Project Description, of the Draft EIR details the proposed Project's alignment, noting that the proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. Figure 2-7 in Section 2.0, Project Description, shows the proposed Project's ANSI Requirements and Additional Separation Buffer. Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, and Appendix N, Additional Separation Buffer, of the Final EIR details the proposed Project's Additional Separation Buffer. Figure 2-8 in Section 2.0, Project Description, shows the portions of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property, which are described more specifically in Appendix Q, Proposed Alignment Plan and Profile. Refer to Figure 2-10: Proposed Alameda Station Location, Figure 2-12: Proposed Alameda Tower Location, Figure 2-14: Proposed Alpine Tower Location, Figure 2-17: Proposed Chinatown/State Park Station Location, Figure 2-19: Proposed Broadway Junction Location, Figure 2-21: Proposed Stadium Tower Location, and Figure 2-24: Proposed Dodger Stadium Station Location, of Section 2.0, Project Description, showing each proposed Project component's location and proximity to nearby buildings and other structures and land uses. The location of the proposed Project is also described in detail in Section 2.0, Project Description, of the Draft EIR, at pp. 2-19 to 2-41. Additional graphics for the proposed Project's alignment profiles is provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR.-In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are not readable due to the scale of the graphics, Appendix Q has been updated to add larger insets of several graphics. Appendix O, Supplemental Graphics of Proposed Project Plan and Profile, of this Final EIR includes larger scale version of these graphics.

Comment GO14-93 Figure 2-8 does not distinguish between types of publicly owned property—showing all publicly owned property in one color, whether public right-of-way or public parkland.

Response GO14-93 Refer to Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, page 5, for a graphic showing respective ownership of public property and private property, which depicts California State Parks Property as distinct from City ROW, City-owned property, Metro property, Caltrans property, and private property. Refer to Response

GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts.

Comment GO14-94 Referenced images found in Appendix Q are more detailed, but still provide insufficient information, and are also quite large file sizes. Metro should not presume that all members of the public have adequate computer technology at their disposal to enlarge the images by "zooming in" to study these images. Rather than providing one electronic image that may be zoomed in, the DEIR should instead (or in addition) provide an enlarged representation of both Figures 2-7 and 2-8, as well as each page found in Appendix Q, on a mapped series of images so that all interested members of the public, including those who need to view the document in hard copy as well as those who have computer access but cannot readily manipulate large files, have an opportunity to review and comment on concerns regarding the Project alignment after having reviewed adequately sized images.

Response GO14-94 As this commenter notes, additional graphics depicting the proposed Project alignment are provided in detail in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR. Further, as shown on the Notice of Availability for the Draft EIR, copies of the Draft EIR were available for public review at three separate public libraries and at the public library at Metro headquarters. As discussed in Appendix A, Public Outreach Report, of the Final EIR, hard copies of the Draft EIR were available at all in-person public meetings held by Metro during the public review period, and, at these in-person meetings, large, printed boards showing the proposed Project alignment were provided for attendees to view. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts. In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are not readable due to the scale of the graphics, Appendix Q has been updated to add larger insets of several graphics. Appendix O, Supplemental Graphics of Proposed Project Plan and Profile, of this Final EIR includes larger scale version of these graphics.

Comment GO14-95 The Project alignment illustrations also do not provide adequate information about the so-called "Additional Separation Buffer." (See discussion, supra p. 12.)

Response GO14-95 Refer to Response GO14-33 for discussion of the Additional Separation Buffer. Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's requirement to contain sufficient information about the proposed Project to allow a complete evaluation and review of its potential environmental impacts. In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are not readable due to the scale of the graphics, Appendix Q has been updated to add larger insets of several graphics. Appendix O, Supplemental Graphics of Proposed Project Plan and Profile, of this Final EIR includes larger scale version of these graphics.

Comment GO14-96 6. Project Ridership is based on speculation, not substantial evidence.

The project description describes ridership estimates for the Project. "During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes." (DEIR, p. 2-42.) As discussed above, the Project Description misleadingly focuses not on the total time it would take to be transported from Union Station to Dodger Stadium via the Project including the wait or queueing time, but only on the travel time. In addition, the project description's focus on alleged 2042 estimates of 5,000 people per hour per direction misleads a DEIR reviewer who may not delve further into the details. The 2026 estimated hourly users are only 3,000 per hour. (DEIR, pp. 3.17-34 to 3.17-35.)

The estimate of people allegedly moving through the system per hour also depends entirely on the configuration of gondola cabins. The DEIR discloses that gondola cabins can be configured to carry between 30 to 40 people. (DEIR, pp. ES-3, 2-2, 2-18.) A survey of the DEIR, including Appendix N (which includes discussion of the gondola ridership model), discloses that there is no discussion whether cabins will be configured to carry 30 people or 40 people, or some other number, or whether there would be a mix of cabin configurations. The number of passengers moved per hour if each cabin has 40 people is obviously significantly greater than the number that can be moved if each cabin only has 30 people.

For example, assuming the gondola system were able to operate perfectly with a 23-second headway that is never interrupted by any delay due a technical issue or passenger loading problem, the Project would move 156.5 cabins per hour. (60 minutes x 60 seconds ÷ 23 ≈ 156.5.) This number of cabins configured to hold 30 passengers can thus move 4,695 passengers per hour. (156.5 x 30 = 4,695.) Cabins configured to hold 40 passengers can move as many as 6,260, or 33% more passengers per hour. (156.5 x 40 = 6,260). The actual cabin configuration, which the DEIR does not explain, matters a lot. These are maximal projections, assuming there is never a breakdown, never a passenger loading or other problem, and all cabins are always full.

Response GO14-96 The commenter refers to Section 2.0, Project Description, of the Draft EIR, which states the proposed Project capacity of up to approximately 5,000 people per hour per direction (pphpd) and travel time from LAUS to Dodger Stadium of approximately seven minutes. Refer to Topical Response J, Gondola Design and Operations, for details regarding the proposed Project capacity of up to approximately 5,000 pphpd. Based on the current design, the calculated characteristics when operating at system capacity (e.g., during Dodger games or events at Dodger Stadium) would be approximately 53 cabins in service on the system. Under this scenario, the cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds). The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd. To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for the proposed Project ridership model and analysis, which takes into account travel time, as well as wait and transfer time. Assumptions about wait/transfer time are included in the columns for the example zip codes of model data. Environmental documents for transit corridor projects typically include opening year and horizon year analyses consistent with Metro and Federal Transit Administration (FTA) requirements. The commenter refers to the table summarizing ridership estimates, which are included in Section 3.17, Transportation, of the Draft EIR, and include the estimate of 6,000 riders in the anticipated opening year of 2026 and 10,000 riders in the project horizon year of 2042. These data are presented clearly in Section 3.17, Transportation, of the Draft EIR as is customary.

Comment GO14-97 Moreover, the Dodger Game Project ridership estimates are based on an untested model created specifically for the Project. (DEIR, Appx. N, pdf p. 6 (Fehr & Peers, Ridershop Model Development report, Sept. 2022).) The model inexplicably seems to use data from only two zip codes for inputs, one very near Dodger Stadium (90012, 0.6 miles away) and one in South Los Angeles relatively far from Dodger Stadium (90044, 10 miles away) to model estimated Project ridership. (Ibid. pdf pp. 9-12 (Table 1: Model Inputs and Data Sources).) It is inappropriate to extrapolate from such a small amount of data to model Los Angeles's complex transportation system. (Moreover, for nearby 90012 patrons only 0.6 miles away, why would they ever wait

in line for up to two hours to return home when they could walk in ten to fifteen minutes?)

A far more reliable transportation analysis was performed by the UCLA Mobility Lab to assess claims made by the Project proponent that it would have up to 10,000 riders per Dodger Game, thereby removing up to 3,000 vehicles from Los Angeles streets:[47]

> The UCLA researchers — led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering — used the "LA Sim" model they created based on activity-based travel demand and agent-based simulation models. The model is grounded in the theory of "discrete choice," for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network.
>
> (UCLA Mobility Lab report, pp. 1-2 (emphasis added).)

Using the "discrete choice" model "based on real data," the UCLA Mobility Lab study concluded that the proposed gondola would have far fewer users, and the majority of those (2,500 of 4,690 gondola riders) would be drawn from regular users of the Dodger Stadium Express. (UCLA Mobility Lab report, p. 3.) The study concluded that only 608 vehicles would be removed from local roadways compared to current conditions, only a small fraction of the claimed vehicle reduction due to the project. (Ibid.)

Footnote 47: UCLA Mobility Lab, Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions, Oct. 24, 2022, attached as Exhibit P.

Response GO14-97 Refer to Topical Response B: Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation and Appendix N, Transportation Appendices, of the Draft EIR for a detailed analysis of the proposed Project's ridership model. The comment alleges that the ridership model's travel data were gathered from cell phone data for two zip codes. This is not accurate. As shown on Figure 1 and Table 1 on pages 3 and 4 of Appendix N-Ridership Model Development to the Draft EIR, the modeling used Dodger ticket purchases and GIS ESRI's "Routable Network" data by zip code for all zip codes in the Southern California region from which tickets were purchased. The comment's misperception that only two zip codes were used could possibly arise from two "examples" included in Appendix N to describe how the model produces different transit mode share results for different zip codes based on the travel time and cost characteristics associated with each individual zip code. As examples, the two sample zip codes were not intended to represent the full set of calculations from the model. The model produced custom mode share results for each of hundreds of zip codes in

the ticket purchase database. Furthermore, as discussed on page 3.17-28, in Section 3.17, Transportation of the Draft EIR, existing mobile source data collected and aggregated by Teralytics and consisting of approximately 2.1 million trip samples was used to calculate average trip length for vehicles traveling to and from Dodger Stadium on game days for zip codes within a 50-mile radius of Dodger Stadium. The sample sizes used in the analysis were robust.

Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, noted as Exhibit P to this comment. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or in appropriate for use.

Moreover, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Ridership Model Development Memorandum of the Draft EIR.[17] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment GO14-98 More important, only a fraction of those who would use the gondola on the way to a game would use it afterwards. "This suggests that fans are unlikely to wait in line for the gondola after the game, instead taking the Dodger Stadium Express or perhaps opting for a ride-share, which would increase traffic and greenhouse gas emissions after the game." (Ibid., p. 4.) UCLA's study is corroborated by LACTC's 1990 Dodger Transit Access study, which showed that an aerial tram was the worst choice of the options then studied, because it had the longest wait times. "Any transit technology must accommodate a peak loading phenomenon where up to 56,000 persons enter

[17] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

or leave [Dodger] Stadium within a brief period of time before or after events." (LACTC Study, supra fn. 43, p. iii.)

Response GO14-98 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of post-game transportation management, including the potential for proposed Project riders to leave Dodger Stadium via other modes such as rideshare. Refer to Response GO14-97 and Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

As described in Section 2.0, Project Description, of the Draft EIR, the two primary types of aerial transit used in urban environments are tramways and detachable gondolas. As shown in Table 1 of the 1990 Dodger Stadium Transit Access Study (1990 study) referenced in the comment[18], the gondola technology evaluated in that study was a reversible tramway system consisting of two 125-passenger cars, similar to the Portland Aerial Tram in Portland, Oregon and the Roosevelt Island Aerial Tramway in New York, New York. An aerial tram system typically has two cabins that shuttle back and forth between two end terminals. The proposed Project is a detachable gondola system. An aerial gondola system includes multiple cabins that travel on a continuously circulating cable, which allows for an overall higher system capacity and ability to move more people per hour in in each direction than an aerial tram. Furthermore, the proposed Project would be a modern 3S system with the capacity to move 5,000 people per hour per direction with a travel time from Los Angeles Union Station (LAUS) to Dodger Stadium of seven minutes, far greater than the 2,800 persons per hour capacity estimated in the 1990 Study for the two-car reversible tramway system. As such, the two systems are not comparable, and findings in the 1990 Study comparing the tramway system to other modes as analyzed in that 33-year-old study are not relevant to the current proposed Project.

Comment GO14-99 The project description ridership estimate focuses the reader on future conditions unlikely to ever occur, based on an unreliably speculative and untested model that inappropriately extrapolates a tiny amount of data from only two zip codes to model the entire Los Angeles transportation network. (DEIR, Appx. N, pdf pp. 9-12.) The unbiased UCLA Mobility Study uses real-world, multi-modal transportation data to reliably predict actual Project ridership.

[18] Gruen Associates. 1990. Dodger Stadium Transit Access Study. Available at: https://libraryarchives.metro.net/dpgtl/lactc/dodger_stadium_access_study.pdf. Accessed August 2023.

The DEIR fails as an informational document because the project description estimate of Project ridership is not based on reliable, substantial evidence, but rather on speculative assumptions.

Response GO14-99 Refer to Responses GO14-97 and GO14-98 for discussion of the proposed Project's ridership model.

Comment GO14-100

GO14-100A 7. The DEIR's description of Project queueing is incomplete.

The DEIR project description describes that "[q]ueueing areas would be built into and as necessary, adjacent to, each of the stations to provide a gathering place for passengers waiting to enter the stations, thereby preventing crowding of sidewalks and walkways by passengers around stations." (DEIR, p. 2-44 (emphasis added).) This project description is not sufficiently precise to inform the public where the additional queueing areas, proposed to be built on an as-needed basis, would be located. It also does not allow commenters to examine whether the spaces proposed for queueing will be of sufficient size. These failures are particularly important because the Project plans to utilize existing public parklands to accommodate its land use needs including, apparently, for queueing.

GO14-100B For example, discussion of queueing for the Alameda Station explains some queueing for will be located "to the west north of the Placita de Dolores of El Pueblo de Los Angeles. (DEIR, p. 2-52; see also, DEIR, p. 3.2-2, providing additional description explaining that queueing would be located "in a proposed new pedestrian plaza in an area currently containing a parking and loading area for El Pueblo.") There is no basis for the Project to simply take public parklands for its own needs. (See also discussion of El Pueblo land use conflicts, infra pp. 73-75.)

Response GO14-100

GO14-100A Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of for a discussion of queueing, including at the Alameda Station and the Chinatown/State Park Station. Refer to Topical Response J, Gondola Design and Operations, for additional discussion of how the boarding platforms at the Alameda Station, Chinatown/State Park Station, and Dodger Stadium Station have been sized to accommodate the capacity of the proposed Project. Queues at the Chinatown/State Park Station would be within the Station, given the lesser boarding demand and the larger queuing capacity at the Station.

GO14-100B As discussed in Section 2.0, Project Description, of the Draft EIR, vertical circulation elements (i.e. elevators, escalators, stairs) for pedestrian access to the Alameda Station, which would also serve as queuing areas to the station, would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as a parking and loading area for

El Pueblo. On the east, vertical circulation elements would be introduced at-grade from the planned LAUS Forecourt. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. Queueing is not expected to occur into the new pedestrian plaza at El Pueblo since the majority of riders are expected to board from the planned LAUS Forecourt. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, and Section 2.3.8, Project Objectives, for an overview of the proposed Project's objectives. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Responses GO14-152 and GO14-153 for further discussion of the proposed Project's siting near El Pueblo.

Comment GO14-101 The Alameda Station queueing plan also states: "Queueing for Alameda Station would occur in the planned LAUS Forecourt area on the east side of Alameda Street." (DEIR, p. 2-44.) But while the DEIR briefly mentions the LAUS Master Plan and LAUS Forecourt and Esplanade Improvements Project, nowhere does it discuss potential conflicts with either the Master Plan or original plans for the Forecourt. (See DEIR, pp. 2-7 to 2-8.) This is especially puzzling because the Final EIR for the Forecourt and Esplanades Improvements Project from March 2018 is cited in the DEIR. (DEIR, p. 2-8, fn. 8.)

Response GO14-101 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's coordination with Metro on the planned LAUS Forecourt. As discussed in

Section 2.0, Project Description, and on pages 3.17-39 and 3.17-43 in Section 3.17, Transportation, of the Draft EIR, the Alameda Station location, including the station location and queueing, is compatible with Metro's existing plans at LAUS, including the Forecourt and Esplanade Project. The LAUS Forecourt and Esplanade Project was originally conceptualized in the LAUS Master Plan, and the proposed Project would not preclude their implementation. The LAUS Master Plan was a visioning document and does not include any designed or funded improvements.

Comment GO14-102 LA Parks Alliance also notes that the uniform resource locator (url) provided for the Los Angeles Union Station Master Plan (https://www.metro.net/projects/la-union-station/) now autoloads the web page for Metro's LA Union Station Forecourt and Esplanades Improvement Project (https://www.metro.net/projects/la-union-station-forecourt-and-esplanadeimprovements/). (DEIR, p. 2-8, fn. 7.) Review of Metro's list of project web pages (https://www.metro.net/projects/) discloses no website url for the LAUS Master Plan. The DEIR thus provides public commenters with no easy access to the Master Plan so they may review it for consideration of potential Project conflicts with the LAUS Master Plan.

Response GO14-102 Refer to Response GO14-101 regarding the LAUS Master Plan.[19]

Comment GO14-103 Further, the DEIR does not provide sufficient information as to the typical number of people expected to be queueing at any of the Project's proposed stations. For a Project that proposes to push up to 10,000 people through a private transit system 30 to 40 people at a time for two hours, the failure to include this information is incomprehensible. Because the information is missing, there is no evidence, let alone substantial evidence, to support the DEIR's conclusion that queueing at the proposed Chinatown/State Historic Park station can be accommodated entirely within the station structure. (DEIR, p. 3.1-42.) Review of the entire DEIR shows discussion of queueing locations. Queueing times and volume are nowhere found.

Response GO14-103 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for a discussion of queueing, including at the Chinatown/State Park Station. As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. As such, Topical Response B is provided only for informational purposes. While not required for transportation, as discussed in Section 3.13, Noise, of the Draft EIR, estimates of passengers at stations were used for data input to evaluate operational noise. Refer to Response GO14-100A for discussion of queueing. Queues at the Chinatown/State Park Station would be accommodated within the station, given that the boarding demand would be less

[19] Los Angeles County Metropolitan Transportation Authority, Los Angles Union Station master Plan. This document is no longer available online. The Transforming Los Angeles Union Station summary is available at: http://libraryarchives.metro.net/DPGTL/unionstation/2015-transforming-los-angeles-union-station-summary-report.pdf. Accessed November 2023.

than at the Alameda Station (15 percent of total ridership at the Chinatown/State Park Station versus 85 percent at the Alameda Station) and the larger queueing capacity at the Chinatown/State Park Station due to the ability to accommodate a mezzanine level in the station's design, the queue is expected to be fully accommodated within the Chinatown/State Park Station and is not anticipated to extend outside of the station.

Comment GO14-104 The DEIR fails as an informational document because the project description and DEIR do not provide the Project queueing information necessary to analyze and consider potentially significant conflicts between queueing locations and activities that would impact parklands used by and adjacent to the Project, and also because the DEIR does not discuss potential conflicts between the Project and the existing LAUS Master Plan and LAUS Forecourt and Esplanade Improvements project, the latter of which has already undergone environmental review.

Response GO14-104 Refer to Responses GO14-101 and GO14-103 for discussion of queueing at the proposed Project's stations. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation. As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. As such, the queuing discussion in Topical Response B is provided only for informational purposes. While not required for transportation, as discussed in Section 3.13, Noise, of the Draft EIR, estimates of passengers at stations were used for data input to evaluate operational noise. Refer to Response GO14-82 for a discussion of how the Project Description complied with CEQA's content requirements. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO14-105 8. The DEIR's project description regarding signage raises potentially significant environmental impacts that are never discussed or mitigated.

The DEIR project description notes that the "proposed Project would include signage" which "may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising… Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins." (DEIR, p. 2-45 (emphasis

added).) DEIR Appendix C does not provide any additional information with details of the Project's signage program. (See DEIR, Appx. C, pdf pp. 15, 363.)

The DEIR states: "Signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC)." (Ibid.) That signage would conform to the Los Angeles Municipal Code (which is, of course, always subject to change) is not sufficient to limit its potentially significant environmental impacts along the proposed Project alignment. For example, it is not uncommon to find electronic digital displays attached to the top of ride share vehicles, notwithstanding that California law allegedly prohibits them.[48] If such signage were attached to the exterior of moving gondola cabins the aesthetic and other impacts at visually sensitive locations along the Project alignment, for example, within Los Angeles State Historic Park, would be potentially significant.

The DEIR's aesthetic impact analysis acknowledges that views of the Los Angeles skyline, considered a protected aesthetic resource in the LA State Historic Park General Plan and Final EIR (see discussion, supra p. 39), "would be partially interrupted due to the Project" without even considering impacts from possible cabin-mounted electronic digital displays. In addition, the DEIR's discussion of light and glare impacts is incomplete with no discussion of such displays, which invalidates the DEIR's conclusion that operational impacts would be less than significant. (DEIR, p. 3.1-52 to 3.1-53.) The DEIR also seems to have neglected inclusion of depictions of nighttime lighting or signage to assist the public or decision makers in assessing nighttime aesthetic or other impacts.

Footnote 48: See Cal. Vehicle Code, §§ 25400, 25950. But see, Uber dot com, Uber Out-of-Home (OOH) cartop advertising program, showing a typical cartop digital advertising display frequently seen on Los Angeles streets, available at https://www.uber.com/us/en/about/car-advertising/ (last checked Jan. 11, 2023). A screen capture of the page depicting the cartop digital advertising display is attached as Exhibit Q.

Response GO14-105 This response takes into consideration the content of Exhibit Q, referenced in this comment. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for

the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes KOPs updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Section 3.01, Aesthetics, and the Lighting Study, of the Draft EIR, and Section 5.0, Corrections and Additions, of the Final EIR, which includes an Analysis of Supplemental KOPs, for discussion of how the proposed Project's signage would result in less than significant impacts, including as to the Los Angeles State Historic Park. Refer to Section 3.04, Biological Resources, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of lighting with respect to biological resources, including in the Los Angeles State Historic Park. As discussed therein, lighting would be low-level and primarily integrated into the architectural features. Exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats.

Comment GO14-106 Because the project description includes the possibility that gondola cabins, among other Project elements, may have electronic digital displays but describes virtually no details and provides no limitations on their implementation, it is impossible to assess the potentially significant adverse environmental effects of the Project to Los Angeles State Historic Park or other locations along the Project corridor. The DEIR thus fails as an informational document for failing to include information necessary to allow the public and decisionmakers to consider the Project's environmental effects and whether a mitigation measure is necessary to eliminate or limit adverse impacts.

Response GO14-106 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Response GO14-105 for discussion of how no digital signage is proposed on the exterior of the cabins.

Comment GO14-107 9. The Emergency Operations Plan must not be deferred.

The project description explains that an "Emergency Operations Plan would be prepared as part of the proposed Project…" (DEIR, p. 2-47.) Given that the DEIR and Project proponents repeatedly refer to the aerial tram "[a]s a breakthrough and innovative technology for the region" (DEIR, p. 1-7) it is critical that the Emergency Operations Plan not be deferred but be presented as part of the DEIR to allow for public review and comment. With not even the outline of an Emergency Operations Plan found in the DEIR, it is not possible for members of the public or decisionmakers to assess potentially significant environmental effects on public

services (police and fire) or potentially significant planning conflicts with City of Los Angeles Emergency Operations Plan. (See DEIR, p. 3.9-10 to 3.9-11.) The DEIR provides no discussion or analysis of these issues, and states only that the Project would comply with the City's Emergency Operations Plan and Los Angeles Fire Code. (DEIR, pp. 3.15-19 to 3.15-20.) The project description is inadequate for failing to provide any further information on the Project's Emergency Operations Plan.

Response GO14-107 Refer to Section 2.0, Project Description of the Draft EIR and Topical Response J, Safety and Gondola Operations, for a discussion of the Emergency Operations Plan. CEQA Guidelines section 15126.4 only requires mitigation for significant impacts. The proposed Project's Emergency Operations Plan is not intended or required to mitigate a significant environmental impact. Accordingly, the development of the Emergency Operations Plan is not impermissibly "deferred" under CEQA, contrary to this comment's suggestion. Refer to Response GO14-82 for a discussion of how the Draft EIR's Project Description complied with all of CEQA's content requirements. Refer to Section 3.15, Public Services, for a discussion of how the proposed Project results in less than significant operational impacts to public services, including police and fire.

Comment GO14-108 10. The project description includes the proposed Project's improper use of public parkland as part of its "sustainability features."

The DEIR project description of sustainability features makes numerous unsupported claims. For example, it suggests the Project will "[r]educe vehicle trips to…Elysian Park, and the Los Angeles State Historic Park." (DEIR, p. 2-48.) As already discussed, these claims are illusory and unsupported by substantial evidence. (See discussion, supra p. 9 (potential mobility hub at Dodger Stadium) and pp. 16, 23 (LA State Historic Park ridership is assumed, not supported by substantial evidence).)

Most surprising (and tone-deaf and offensive) the project description lists the Project's unprecedented and unlawful use of LA State Historic Park (see discussion, supra pp. 12-26) at the very top of its list of sustainable site features, lumping LA State Historic Park into the category of "publicly owned property" as if it had no special protections as a historical unit of the California State Park system. (DEIR, p. 2-49.) The sustainable site feature list also suggests, with no trace of irony, that the project is sited and designed "to minimize impacts to historic and archaeological resources, and to preserve viewsheds and local character." (Ibid.) The sustainable site feature list also claims it will provide an "opportunity to enhance open space and green space at the Los Angeles State Historic Park."

These Orwellian claims are audacious and unsupported. The sustainability claims disregard that the Project is in direct conflict with LA State Historic Park's General Plan and mitigation measures of the park General Plan's Final EIR, as well as with

state law that protects our state parks, especially historic units, from incursion by commercial interests. None of these obvious conflicts are adequately discussed or analyzed in the DEIR.

The DEIR project description misleadingly minimizes impacts to LA State Historic Park and insults the public's intelligence by referencing the devastating impacts as project benefits.

Response GO14-108 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 5.5.4, Location of Chinatown/State Park Station, of Section 5.0, Other CEQA Considerations, of the Draft EIR for a discussion of the siting considerations for Chinatown/State Park Station. As discussed therein, several locations were not carried forward for further examination because they required either a larger footprint within the Los Angeles State Historic Park, or would eliminate transit access to the Park. Ultimately, the proposed Project's Chinatown/ State Park Station location was chosen over the other potential locations because it minimized the proposed Project's potential footprint within the Los Angeles State Historic Park and impacts to neighboring properties while maintaining transit access to the Park and surrounding communities. As discussed in Section 2.7.8, Sustainability Features, of the Draft EIR, the list of the proposed Project's sustainability features was compiled from features included in the 2019 California Green Building Standards Code, United States Green Building Council Leadership in Energy and Environmental Design (LEED) for New Construction, and The Institute for Sustainable Infrastructure's Envision Rating System, and was categorized by sustainable sites, location/transportation/quality of life, among other categories of sustainable features. Accordingly, the list of the proposed Project's sustainability features is based on best sustainability standards and codes, and properly takes into account siting and the ability to reduce vehicle trips to the Los Angeles State Historic Park.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the proposed Project's sustainability features. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancement. Refer to Responses GO14-39 through GO14-43, and GO14-52, for discussion of how park ridership is supported by substantial evidence in the Draft EIR. Refer to Response GO14-22 for discussion of how the proposed Project will include a mobility hub at Dodger Stadium.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park

Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Refer to Section 3.05, Cultural Resources, and Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR for a discussion of archaeological resources at the Los Angeles State Historic Park. As discussed in Section 3.05, the Chinatown/State Park Station footprint is entirely located within the boundary of Resource 19-003120 (consisting of the remains of the Southern Pacific Railroad's River Station). Extensive archaeological work has been conducted at the site, and when the Chinatown/State Park Station (including the construction staging area) is overlaid on an archaeological sensitivity map developed by California State Parks, it appears that the Chinatown/ State Park Station is located in an area not identified as low sensitivity for archaeological resources by State Parks. Nevertheless, with the implementation of mitigation, construction of the proposed Chinatown/State Park Station would result in a less than significant impact related to a substantial adverse change in the significance of archaeological Resource 19-003120.

The Draft EIR provided objective facts and analysis from experts in their respective fields in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO14-109 D. The DEIR's Analysis of Aesthetic Impacts is Grossly Inadequate.

This letter focuses its primary objection to the DEIR's inadequate aesthetics impact analysis on the DEIR's minimization of adverse aesthetic impacts to Los Angeles State Historic Park. LA Parks Alliance notes, however, its strong objection to the DEIR's inadequate analysis of impacts to LA Union Station, El Pueblo de Los Angeles State Historic Park, and other parkland and public areas along the proposed Project corridor, for similar reasoning as included below in subsections D(1) and D(3), as well as for the reasons other commenters will undoubtedly provide in response to the grossly inadequate DEIR.

"A project will normally have a significant effect on the environment if it will…[h]ave a substantial, demonstrable negative aesthetic effect[.]" (Quail Botanical Gardens Foundation, Inc. v. City of Encinitas (1994) 29 Cal.App.4th 1597, 1604, quoting CEQA Guidelines, Appx. G.) "[I]t is inherent in the meaning of the word 'aesthetic' that any substantial, negative effect of a project on view and other features of beauty could constitute a 'significant' environmental impact under CEQA." (Ibid.)

The DEIR fails to adequately analyze aesthetic impacts, including visual impacts along the entire Project corridor, but especially on views of and from Los Angeles State Historic Park. As the DEIR notes, "analysis of existing visual or aesthetic resources and potential visual or aesthetic impacts can be highly subjective, dependent upon the background of the assessor and the opinions of viewers." (DEIR, p. 3.1-29.) California courts generally agree, finding that analysis of potentially significant aesthetic impacts is not the sole province of experts. The opinion of lay persons with respect to aesthetic and certain other impacts, particularly when presented by more than just a few persons, often constitutes substantial evidence of a significant environmental impact. (See, e.g., Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist. (2004) 116 Cal.App.4th 396, 402-403.)

Response GO14-109 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The methodology utilized to examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). As a result of this guidance, a group of Landscape Units (LU) and Key Observation Points (KOPs) were delineated and identified based on known significant views and locations with proposed changes to the setting and subjected to review and analysis identified within the aforementioned framework. Further, views and potential impacts were all analyzed using the same thresholds of significance identified by the State CEQA Guidelines and the Los Angeles CEQA Thresholds Guide. In this case, the analysis and conclusions of the Draft EIR are supported by the substantial evidence of the visual simulations, use of Federal Highway Administration (FHWA) methodology, application of clear thresholds of significance, and recognition that this urban location would be regulated by existing zoning and other regulations governing scenic quality, including proposed design standards. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof

design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, certain southwest-facing views of the downtown Los Angeles skyline from Los Angeles State Historic Park, particularly views close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the view from most locations in the park would remain where the view would be uninterrupted by the proposed Project. These views include looking towards downtown from the southwestern corner and from the Roundhouse platform and walkway within the park. In addition, existing views of downtown from other areas within the Park are already interrupted under existing conditions by trees and intervening development. Also, the location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area.

The Draft EIR's analysis of impacts to aesthetics was prepared by an expert in the field, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO14-110 1. The DEIR's use of images is misleading and incomplete.

The DEIR minimizes the Project's aesthetic impacts through its use of misleading images sprinkled throughout the DEIR and by failing to provide necessary simulated depictions of the Project to assist the public and decision makers to fully understand its visual impacts. For example, Figure 2-5, depicting the "Illustrative Design of a Station" (DEIR, p. 2-15), shows a view of Alameda Station as seen from the LA Union Station property looking approximately northwest. Later, the DEIR shows a depiction of existing LA Union Station from an angle that appears to be the approximate reverse angle. (DEIR, p. 3.1-19, Figure 3.1-3; see also DEIR, Appx. C, pdf p. 46, Figure 4-6.) But where is the simulated view depicting the Alameda Station in front of LA Union Station?

Every simulated view of Alameda Station appears to have been selected to avoid depicting the station as obscuring views of LA Union Station in any way. (DEIR, Appx. C, Figures 5-1 through 5-11, pdf pp. 109-119.) But clearly there are views that would obstruct Union Station, or the depiction of Alameda Station in the bottom image of Appx. C, Figure 5-4, would not be possible.

Similarly, Figure 2-6 depicts the "Illustrative Design of a Tower." (DEIR, p. 2-16.) This simulated view shows the Project's Alameda Tower (described in the image caption as being "in the foreground") and Alpine Tower (described as being "in the middle ground"). (Ibid.) But whether intentional or inadvertent, the simulated image's use of "foreshortening" obscures the apparent height of the towers, making them appear far smaller than they really are. The "foreground" Alameda Tower appears shorter than an even nearer telephone poll, even though it is likely four or five times taller. The more distant Alpine Tower appears only half as tall as the Alameda Tower. When used to create whimsical photographs, foreshortening can provide an entertaining, comical effect.[49] But it can also be used to minimize the visual impact of a large structure, even if perhaps inadvertently, as it does in the DEIR.

Footnote 49: Most people are familiar with photographs depicting persons interacting in some way with a distant object, often a building. For example, a photo at the following web page depicts the leaning tower of Pisa as if it were part of a large ice cream cone being enjoyed by a visiting tourist: https://huebliss.com/foreshortening-photography/ (last viewed Jan. 12, 2023).

Response GO14-110 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. The Draft EIR and Visual Impact Assessment specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds of or from LAUS. The Draft EIR studied thirty KOPs, including 8 that simulated views of the Alameda Station location from or near LAUS:

- KOP 1: Looking East from Los Angeles Street
- KOP 2: Looking North on Alameda Street
- KOP 3: Looking Northeast from El Pueblo
- KOP 4: Looking Northwest from LAUS
- KOP 5: Looking Northeast from New Pedestrian Plaza West of Alameda Station

- KOP 6: Looking East from Avila Adobe
- KOP 7a: Looking Southeast from Olvera Street
- KOP 7b: Looking North from Cesar Chavez Avenue

The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of LAUS.

Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, in response to comments received on the Draft EIR during the public review period. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. KOPs selected for simulation will appear larger and more distinct than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. As such, visual elements in the foreground can sometimes block the full view of visual elements at a distance even though the foreground element may be of a smaller dimension. Further, visual simulations were created to reflect the proposed project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken.

Comment GO14-111 The selection of simulated views of the Project appears calculated to minimize visual impacts of the Project. For example, a depiction of the proposed pedestrian plaza at El Pueblo is at an angle showing the plaza at a great distance while depicting only a small portion of the massive station (see Figure 2-9), which the DEIR describes as "173 feet long, 109 feet wide, and 78 feet high." (DEIR, p. 2-23.) A depiction of pedestrian improvements at the proposed Chinatown/State Park Station shows one of the few somewhat close views of the station, but from a vantage point that is almost entirely obscured by plants, pedestrians, and Project hardscape shelter elements. (Figure 2-9, DEIR, p. 2-31.) There is no other simulated view depicting the Chinatown/State Park Station in the main DEIR document. The top image of Figure 6-18 (DEIR, p. 6-33) depicts the proposed Project from the "roundhouse" area of LA State Historic Park, approximately 1,300 feet away (measured using Google maps "measure distance" feature). (See also DEIR, p. 6-30 (textual description of the simulated image).)

The only close image of Chinatown/State Park Station within Appendix C appears to be Figure 5-17. (DEIR, Appx. C, pdf p. 125.) Chinatown/State Park Station completely dominates and obscures the existing park entrance. Figure 5-18 depicts

a simulated view of Chinatown/State Park Station masked by a large tree in the foreground. (DEIR, Appx. C, pdf p. 126.) Figure 5-19 includes a depiction of the Project looking southeast from the southwestern portion of LA State Historic Park, directly beneath the eastern-most gondola cables. (DEIR, Appx. C, pdf. p. 127.) In this depiction the station can be seen, presumably because trees that would have obscured it had to be removed to avoid being too close to hanging gondola cabins. (See upper "existing" image.)

Response GO14-111 Refer to Response GO14-110 for discussion of the analysis of aesthetic impacts from the proposed Project in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, including selection of KOPs and the methodology used to prepare the KOPs described in greater detail in Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR. Refer to Figure 2-16 on page 2-31 of Section 2.0, Project Description, of the Draft EIR, for an illustrative design of pedestrian improvements at Chinatown/State Park Station, which depicts the Chinatown/State Park Station. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project.

Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already

partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. The Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park in Appendix H.2. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment GO14-112 But this depiction is taken at an angle that shows the Los Angeles skyline to the right of the station. Almost the entirety of LA State Historic Park would experience the station as being between the viewer and the Los Angeles skyline. Figure 5-20a depicts the station partially obscuring the Los Angeles skyline. (DEIR, Appx. C, pdf p. 128.) But this image is taken from an elevated angle, and therefore depicts the station as appearing lower on the horizon than it would if taken from the location of people on the lawn below. Figure 5-20b corrects this problem as it depicts a simulated image from a lower elevation. (DEIR, Appx. C, pdf. p. 129.) Curiously, however, even though this is described as from the same location as the previous depiction (from the roundhouse within LA State Historic Park), the entire City of Los Angeles skyline has somehow shifted several degrees to the right and is no longer partially obscured by the Chinatown/State Park Station.

Response GO14-112 As described in the KOP Figure Mapbook included in Appendix C, Visual Impact Assessment, of the Draft EIR, Figure 20a, which is KOP 17, depicts the existing viewpoint from the perspective of a pedestrian or recreationalist looking southwest towards Chinatown and downtown Los Angeles from the interior of the Los Angeles State Historic Park. Figure 20-b, which is also KOP 17, depicts the view looking southwest from the roundhouse within the park and this view is "provided at a larger scale for informational purposes only." Refer to Response GO14-110 for discussion of the analysis of aesthetic impacts from the proposed Project in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, including selection of KOPs and the methodology used to prepare the KOPs described in greater detail in Appendix H.1, Memo Regarding Preparation of View

Simulations, of the Final EIR. Refer to Response GO14-111 for discussion of how impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park, and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment GO14-113 It is also appropriate to note that the simulated images do not always accurately portray gondola cables. The DEIR's cover image clearly shows six cables (two sets of three). (DEIR, cover page.) This is consistent with a textual description of the cable system. (DEIR, p. ES-3). But numerous simulated images show only four cables (two sets of two). (See, e.g., from the DEIR: Figure 2-6, Figure 4-10, Figure 6-14 (top image), and Figure 6-16 (bottom image); from DEIR, Appx. C: Figure 5-5, Figure 5-9, Figure 5-10, Figure 5-11, Figure 5-15, Figure 5-18, and Figure 5-19). These conflicting images, some with four gondola cables and some with six, make assessment of the visual impacts of the Project difficult to understand and assess.

Response GO14-113 Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulations were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible. Additionally, renderings include 3 cables, though some imagery may show only 2 visible cables due to perspective.

Comment GO14-114 Finally, Figures 5-21 and 5-22 simulate additional distant views of Chinatown/State Park Station, the first from the sidewalk in front of the LA State Historic Park, the second from the Park itself. (DEIR, Appx. C, pdf pp. 130-131.) Using the Google maps measuring tool and the image key (Figure 4-4, DEIR, Appx. C, pdf p. 44) the depicted views appear to be from approximately 1,600 feet (Figure 5-21) and 2,200 feet (Figure 5-22) distant.[50]

The DEIR's use of misleading images and failure to provide images that adequately convey the full scope of visual impacts along the entire Project corridor, but especially impacts associated with LA Union Station, El Pueblo de Los Angeles, and Los Angeles State Historic Park, cause it to fail as an informational document.

Footnote 50: DEIR Figure 5-23 depicts a simulated view from the "North Broadway historic bridge" at a distance of approximately 3,400 feet using the Google maps measuring tool. (DEIR, Appx. C, pdf p. 132.) The utility of depicting the Project from the No. Broadway bridge is unclear, however the massive structure of the

Chinatown/State Park Station can be easily seen even from this great distance, though it does not obscure the Los Angeles skyline from this simulated camera position.

Response GO14-114 This comment provides a general recitation and characterization of the Draft EIR. Refer to Responses GO14-110 through GO14-113 for discussion of the aesthetics analysis in the Draft EIR and aesthetics impacts of the proposed Project, which would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, additional visual simulations of the park to further analyze viewshed impacts to the Park, in response to comments received on the Draft EIR during the public review period. The EIR has accordingly provided sufficient information for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts, and does not "fail as an informational document."

Comment GO14-115 2. The DEIR ignores protections and mitigation measures imposed by the certified Final EIR for Los Angeles State Historic Park's General Plan.

The DEIR acknowledges that the Project would have a "significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." (DEIR, ES-58.) The DEIR asserts, however, that the essential conflict between the Project's proposed use of land at Los Angeles State Historic Park is technical, and correctable by adoption of Mitigation Measure LUP-A which merely requires "[o]btain[ing] a Los Angeles State Historic Park General Plan Amendment." (Ibid.) This assumption is grossly in error. Under California law, LA State Historic Park is plainly not available for the benefit of the Project. (See discussion, supra pp. 12-26.)

Response GO14-115 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to

inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO14-116 More important, even if a Park General Plan amendment were available to benefit the Project, and it is not, the DEIR fails as an informational document for making little effort to describe the nature of the environmental impacts intended to be addressed by the mitigation measure. Before a mitigation measure may be proposed to address a significant environmental effect, the environmental effect must be adequately identified. (Pub. Res. Code, § 21002.1.)[51] Without first understanding the complete nature of the significant effect it is not possible to assess whether a mitigation measure would reduce impacts to a level less than significant, or if another feasible mitigation measure would be superior. (See CEQA Guidelines, § 15126.4, subd. (a)(1)(B): "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified.")

But the DEIR does not clearly identify the Project's significant environmental effect(s)—it only identifies the mitigation. The DEIR assumes that whatever the significant effect is, papering over it with a revised General Plan will suffice. There is thus no way to assess whether the mitigation is sufficient to reduce the significant environmental effect(s) to a level less than significant, because the nature of the impact is not adequately described.

Footnote 51: When a lead agency determines that a mitigation measure cannot be legally imposed, as Metro should have determined here, the mitigation measure need not be proposed or analyzed. (CEQA Guidelines, § 15126.4, subd. (a)(5); see discussion, supra pp. 11-25.)

Response GO14-116 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, of the Draft EIR, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Response GO14-115 for a discussion of Mitigation Measure LUP-A. The comment suggests, without explanation, that Metro should have determined that Mitigation Measure LUP-A cannot be "legally imposed." Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of Metro's consultation with CEQA responsible agencies, including State Parks.

Consultation with State Parks as Draft EIR preparers occurred as part of this process, and comments from State Parks on the Draft EIR were reviewed and incorporated into the Draft EIR. As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, State Parks, as a responsible agency, considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and requested Mitigation Measure LUP-A be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Accordingly, it would be improper for Metro, the lead agency, to determine that State Parks, the responsible agency, could not request a mitigation measure that is solely within the State Parks' jurisdiction. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR. The Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project. Refer to Responses GO14-32 through GO14-54 for responses to comments contained on pages 11 to 25 of this letter, as identified in footnote 54 of this comment GO14-116.

Comment GO14-117 The DEIR's aesthetics analysis summarizes the goals and guidelines of LA State Historic Park's General Plan. (DEIR, pp. 3.1-2 to 3.1-3.) While this recitation is accurate, the DEIR's analysis falls far short. As in its project description of LA State Historic Park, the DEIR's description of the park within Landscape Unit 4 fails to convey the importance of protected views of and from the Park. Lumping LA State Historic Park in with the other community visual features found in Landscape Unit 4, the DEIR concludes that the visual quality of LU-4 is "moderately low." (DEIR, p. 3.1-30.) Moreover, and as will be discussed further, LA State Historic Park's goals and guidelines are intended for use by Park facilities, and are simply not applicable to non-park structures, which have no place and are not permitted in the Park.

For its thresholds of significance, the DEIR chooses the State CEQA Guidelines Appendix G questions and employs guidance from the City of Los Angeles CEQA Threshold Guide in the analysis. (DEIR, p. 3.1-32.) While the Appendix G questions are usually considered adequate for review of a typical development project, they are not adequately responsive to the needs of a historic state park that has aesthetic resource protections already imposed by the Park General Plan and certified Final EIR, including mitigation measures put in place to protect the aesthetic and other resources identified in the Park's EIR.

Response GO14-117 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response S2-5 discussing how the proposed Project would not adversely

impact or interfere with key viewpoints or the visual character of the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including on the Los Angeles State Historic Park, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project in response to comments on the Draft EIR, including at Los Angeles State Historic Park.

Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics. The Draft EIR's analysis of impacts to aesthetics and cultural resources was prepared by experts in their respective fields, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of Metro's consultation with CEQA responsible agencies, including State Parks. Consultation with State Parks as Draft EIR preparers occurred as part of this process, and comments from State Parks on the Draft EIR were reviewed and incorporated into the Draft EIR. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. As discussed on page 3.1-32, of Section 3.01, Aesthetics, of the Draft EIR, the City of Los Angeles CEQA Thresholds Guide was used to provide context to the questions in Appendix G of the CEQA Guidelines. State Parks did not object to the use of this Guide to

provide context for the aesthetics and visual resources analysis, and the Draft EIR in turn provides justification for their use. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan mitigation measure Aes-1 which requires State Parks to review potential aesthetic quality impacts associated with new facilities and implement design practices that reduce those facilities' overall negative aesthetic effect. The proposed Project does not modify this mitigation measure, which applies to State Parks' actions and does not apply to the proposed Project. In any event, the Project Sponsor has been working cooperatively with State Parks to avoid or minimize impacts, including aesthetic impacts to LASHP, thus helping State Parks meet its obligations pursuant to this mitigation measure.

Comment GO14-118 The primary mode of visual analysis undertaken by the DEIR to assess operational aesthetic impacts is use of existing and simulated views of the Project taken from a series of Key Observation Points ("KOPs"). (DEIR, p. 3.1-35; see also Figure 4-1 (KOP Locations Overview), DEIR, Appx. C, pdf p. 41.) As already discussed, the locations selected for these photos seem to have been selected in a manner calculated to minimize the Project's visual impacts. (See discussion, supra pp. 53-55.) The DEIR also does an inadequate job explaining the selection process for KOP locations.

Response GO14-118 Refer to Response GO14-110 for discussion of the methodology used to identify KOPs for the Draft EIR's analysis of aesthetic impacts, which would be less than significant.

Comment GO14-119 The first Appendix G question asks if the Project would "have a substantial view on a scenic vista." (DEIR, p. 3.1-33.) The protected views of the Los Angeles skyline as seen from LA State Historic Park (along with numerous other important visual resources such as views of designated cultural and historic landmarks within the Project area) are largely swept aside as not technically comprising a scenic vista: "There are no designated scenic vistas present in the [Area of Potential Impact]."[52] (DEIR, p. 3,1-33 (emphasis added).) Construction impacts are determined to be less than significant because viewers are either deemed to generally have low sensitivity "and do not necessarily have a personal investment in these views" or because views are "only minimally noticeable because of the distant aspect of that view and the presence of vegetation" or because views of mountain ranges and the Los Angeles skyline would "continue to be available to pedestrians and recreationalists through street corridors." (DEIR, p. 3.1-34.)

Footnote 52: The DEIR does at least acknowledge that some viewers might view things differently: "[V]iews of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains…could be considered scenic to certain viewers although not officially designated as such." (DEIR, p. 3.1-34.)

Response GO14-119 This comment provides a general recitation and characterization of the Draft EIR. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Comment GO14-120 Operational impacts are likewise minimized: "no designated scenic vistas are present in the API." (DEIR, p. 3.1-35.) The protected views from LA State Historic Park, and views of other cultural and historic landmarks in the Project are not individually analyzed. Lumping the entirety of the aesthetic views together allows the DEIR to dismiss them with sweeping generalizations:

> While the Project would include tall visual elements, views of other scenic or panoramic views would continue to be visible from more prominent view locations, such as park areas, or other sections along local streets. In addition, the Project would comprise a very small portion of the broad urban view field. As such, the Project as viewed from public areas in each LU would not block prominent views of notable visual features.
>
> (DEIR, p. 3.1-35.)

The DEIR continues:

> Overall, the proposed Project would not significantly block scenic or panoramic views, such as views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains." (Ibid. (emphasis added).)

The word "overall" does an awful lot of work in the above sentence. Simply put, any "analysis" that lumps a set of individual visually important views together, including

views of designated cultural and historic sites (at least one specifically protected by mitigation measures in a certified EIR, see below) instead of analyzing them for their own unique individual values, must be considered inadequate.

Response GO14-120 This comment provides a general recitation and characterization of the Draft EIR. Refer to Responses GO14-117 and GO14-119 for discussion of how the analysis of aesthetic impacts in the Draft EIR complied with CEQA, and for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Response S2-5 discussing how the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. Refer to Responses GO14-109 and GO14-110 for discussion of the preparation of the aesthetics analysis for the Draft EIR, in compliance with CEQA. This commenter's reference to analysis of "protected views" is noted but CEQA does not require an analysis of this type of view. Further, the commenter takes issue with the conclusion of the analysis of scenic views in Section 3.01, Aesthetics, of the Draft EIR, on pages 3.1-33 to 3.1-35, which includes a detailed analysis is of each individual scenic vista before reaching the conclusion that is quoted. Refer also to Appendix C, Visual Impact Assessment, of the Draft EIR, which discusses individual scenic vistas in the analysis of individual KOPs.

Comment GO14-121 With respect to only LA State Historic Park, the DEIR states: "[V]iews from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views." But as discussed above, the simulated views are entirely inadequate to convey the substantial visual impact of the Project on LA State Historic Park, as the views seem to have been selected in a manner calculated to downplay visual aesthetic impacts. Consequently, they do not provide a basis to completely evaluate aesthetic impacts.

Response GO14-121 Refer to Responses GO14-117 and GO14-119 for discussion of aesthetic impacts of the proposed Project, which would be less than significant, including to scenic vistas. Refer to Response S2-5 discussing how the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park.

Comment GO14-122 Of course, it is also true that courts are generally deferential to an agency's determinations with respect to aesthetic impacts. (See, e.g., North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors (2013) 216 Cal.App.4th 614, 627.) Here that cuts against Metro's determination for the Project, because the agency responsible for determining the aesthetic resources of Los Angeles State Historic Park, the Department of Parks and Recreation, has already well defined the park's aesthetic resources and certified an EIR with a mitigation measure intended to protect them:

Viewsheds

As viewed from the north, especially from the northern two-thirds of the property, the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. Sometimes referred to as the "front porch" of the City, there are no other sites that capture this welcoming view of downtown Los Angeles.

Views of Elysian Park present a welcoming view of green hills and trees. The more distant views of the Verdugo Hills and the occasionally snow-covered San Gabriel Mountains provide vistas of natural landscapes.

In the immediate vicinity of the Park are structures with distinct architectural styles, including a variety of buildings in the Chinatown area, the Chinatown Transit Station, the Capitol Milling Company building, and the Broadway Bridge. (LASHP General Plan, pdf. pp 52-53 (emphasis added).)[53]

The Park's Final EIR acknowledges that it is located "in a dense urban environment," but that fact is an additional justification to protect visual resources, including views seen from the Park, and also views seen of the Park as seen from outside its boundaries:

This Park is situated in a dense urban environment. It does, however, provide a spectacular view of the downtown Los Angeles skyline, as well as views to the nearby Elysian Park and the Verdugo Hills, open space elements that can be rare in an urban landscape. **Any changes that substantially degrade the visual experience *for park visitors and others viewing the Park from adjacent property* have the potential to cause significant impacts**.

(Ibid., pdf p. 121 (discussing the purpose of Mitigation Measure Aes-1) (emphasis added).)

Footnote 53: The Los Angeles State Historic Park General Plan and Final EIR was approved/certified by the State Park and Recreation Commission on June 10, 2005. (LASHP General Plan, pdf p. 125.)

Response GO14-122 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Los Angeles State Historic Park General Plan and Final EIR. Refer to Responses GO14-117 and GO14-119 for a discussion of the Draft EIR's aesthetic analysis. Refer to Response S2-5 discussing how the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Mitigation Measure Aes-1.

Comment GO14-123 The certified Environmental Impact Report for LA State Historic Park protects these important visual resources by restricting the type, location, screening, and materials of structures permitted in the park:

Mitigation Measure Aes-1. Visual impacts can be avoided or reduced by appropriate siting, design, and selection of materials. Specific project designs will define aesthetically appropriate design features, identify visual resources, and identify optimum methods for protecting existing resources. Potential aesthetic quality impacts associated with the development of new facilities shall be reviewed at the project-level for specific facilities or management plans proposed. Mitigation measures include, but are not limited to:

- Implement design practices that reduce the overall negative aesthetic effect of new facilities, including, but not limited to:
    - Include vegetation to screen negative views, or soften the visual effect of parking areas, visitor facilities, roads, trails, or transit corridors, where appropriate;
    - Incorporate architectural site/design elements that support and are consistent with the plan vision;
    - Where night lighting is necessary, direct the lighting downward and locate new exterior lighting such that it is not highly obtrusive;
    - Evaluate the location of structures and activity areas to enhance positive views within and outside of the Park site;
    - Design and site new roads and trails to minimize grading and the visibility of cut banks and fill slopes; utilities should be placed underground where feasible;
    - Schedule construction and maintenance activities to decrease any negative impacts to visitors and adjacent property owners.

(LASHP General Plan, pdf pp. 121-122.)

Response GO14-123 This comment provides a general recitation and characterization of the Los Angeles State Historic Park General Plan and Final EIR. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Mitigation Measure Aes-1.

Comment GO14-124 Moreover, the LA State Historic Park General Plan and Final EIR created the above mitigation for application to Park structures permitted by its General Plan: "Potential installation of facilities allowed by the Plan may constitute a potentially significant aesthetic change…" (Ibid., pdf. p. 115 (emphasis added).) The General Plan and Final EIR do not contemplate mitigations for structures that are not permitted by the Park's General Plan. "[P]otential facilities" evaluated in the General Plan and Final EIR do not provide for non-Park facilities (see ibid., pdf pp. 132-133) which are not permitted in a historical unit of the state park system. (Pub. Res. Code, § 5019.59.) There is no appropriate siting or screening possible for an intruding nonpark, commercial structure in LA State Historic Park. The DEIR lists

the Park's General Plan goals and guidelines (DEIR, pp. 3.1-2 to 3.1-3.) as if they can be applied to any structure, including non-park structures, but the General Plan goals and guidelines are intended only for permissible structures. Other structures are simply not permitted.

Response GO14-124 This comment provides a general recitation and characterization of the Los Angeles State Historic Park General Plan and Final EIR. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment and a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO14-125 As discussed above, the State Parks Commission, in approving the General Plan and certifying its Environmental Impact Report, also protected views of the Park. The DEIR's use of City of Los Angeles CEQA Thresholds to disregard the Park's Mitigation Measure Aes-1, which protects views of the Park from both public and private locations, thus improperly modifies an adopted mitigation measure. (See DEIR, p. 3.1-47 (analysis of LU-4 including LA State historic Park): "the operation of the proposed Project within LU-4, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the impact would be less than significant."; see also DEIR, p. 3.1-47: "[V]isual impacts under the L.A. CEQA Thresholds Guide are assessed based on changes to public views.")

This is improper. A lead agency may not cancel or modify a previously adopted mitigation measure without reviewing its continued need, explaining the change, and supporting its determination with substantial evidence. (See Katseff v. Dept. of

Forestry & Fire Protection (2010) 181 Cal.App. 4th 601, 614.) The appropriate lead agency to modify mitigation Aes-1 is the Department of Recreation and Parks, not Metro. But the Project EIR must explain why Aes-1 is no longer needed and appropriate to change, and support this determination with substantial evidence. Here Metro has not acknowledged the existence of the mitigation measure, let alone explained why it is no longer needed or supported its conclusion with substantial evidence.[54]

Footnote 54: The DEIR notes the existence of the Park's Final EIR (see DEIR, p. 3.1-1, fn. 1), but does not mention, discuss, or analyze modifications to mitigation measures that would be necessary due to the Project. With respect to CEQA's ability to protect private views, see Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist. (2004) 116 Cal.App.4th 396, 402-403

Response GO14-125 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.01, Aesthetics, with supporting information in Appendix C, Visual Impact Assessment, of the Draft EIR, for analysis of the proposed Project's potential aesthetics impacts, which would be less than significant. The comment's referenced mitigation measure (Aes-1) requires State Parks to review potential aesthetic quality impacts associated with new facilities and implement design practices that reduce those facilities' overall negative aesthetic effect. The use of a City of Los Angeles CEQA Threshold does not "disregard" or "modify" this mitigation measure, which applies to State Parks' actions and does not apply to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Mitigation Measure Aes-1.

Comment GO14-126 The DEIR's description of gondola movement with respect to protected views of the Los Angeles skyline also minimizes the Project's aesthetic impacts. "The cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead powerlines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area." (DEIR, pp. 3.1-45 to 3.1-46 (emphasis added).) First, no powerlines are located directly over the top of LA State Historic Park, and gondola cables are larger than powerlines. (DEIR, p. 3.4-19). If gondola cables are both physically closer and also larger, it is logical that they will have a much greater visual impact than distant, smaller powerlines. Second, and more obviously, if gondola cabins are "constantly moving in and out of view" they will have a greater distracting visual impact, especially in the evening and at night when they are lit or display signage (particularly potential electronic digital display signage). The DEIR fails to evaluate and minimizes the visual impacts of gondola cables and cabins.

Response GO14-126 Refer to Response GO14-117 for discussion of the how the Draft EIR assessed potential visual impacts to scenic vistas in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, and the proposed Project would not

block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Section 3.01 for discussion of how the location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project, in response to comments received on the Draft EIR during the public review period. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulations were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible. Refer to Topical Response K, Signage and Lighting, for discussion of how no digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes KOPs updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study.

Comment GO14-127 The DEIR concludes not only that the Project would not have significant aesthetic impacts, but also that it would provide significant visual benefits to LA State Historic Park. (DEIR, p. 3.1-46.) This is absurd. Compare, for example, the before and after images shown in Figure 5-17 of the existing entrance at the Park's southwest corner (DEIR, Appx. C, pdf p. 125):

The proposed siting of the Project's Chinatown/State Park Station within LA State Historic Park at the Park's southwest corner (where many visitors first experience views of the park as they arrive) belies the notion that "visual changes of the proposed Project are minimized somewhat" by its southwest corner location.

Response GO14-127 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO14-117 for discussion of the how the Draft EIR assessed potential visual impacts to scenic vistas in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, and the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The Draft EIR discusses how the proposed Project would provide a visual benefit being near the Park by providing park amenities, a mobility hub, pedestrian improvements, and installation of hardscaping and landscaping near the southern entrance to the park, which currently just includes hardscaping. Further, the Draft EIR discusses how visual quality and character is minimized for LU-4 because the visual changes of the proposed Project are minimized somewhat by the location of the Chinatown/State Park Station, which is south of the majority of the approximately 32-acre park space. For a project in an urban area, a significant impact to visual character or quality would occur if the project would conflict with applicable zoning and other regulations governing scenic quality. The proposed Project within LU-4 would be consistent with Los Angeles State Historic Park General Plan aesthetic resources goals to protect and enhance scenic viewsheds and features, and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources because of the siting of the Chinatown/State Park Station within the southernmost portion of the park away from the open passive park areas. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are

integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO14-128 As the DEIR documents, the massive Chinatown Station (DEIR, p. ES-8: "200 feet long, 80 feet wide, and 98 feet tall at its tallest point") can be easily seen from adjacent views, which the Park's Final EIR protects. (See, e.g., Figure 5-23, DEIR, Appx. C, pdf p. 132 (depicting a simulated view from the "North Broadway historic bridge" approximately 3,400 feet distant.) Protected views of the Park may also be visible from Elysian Park and other distant elevated locations, but the DEIR provides no simulated views. At ninety-eight feet tall, it is a certainty that Chinatown/State Park Station cannot be screened with vegetation to minimize its impact.[55]

Nor does the DEIR suggest screening is needed. (But see LASHP General Plan and Final EIR, mitigation measure Aes-1, describing a general need for screening of structures within the Park.)

Close up – Chinatown/State Park Station (DEIR Appendix C Figure 5-23)

Footnote 55: LA Parks Alliance notes that Design Option C, which would be 35 feet taller than the preferred Project, would have an obviously greater impact on protected views of and from LA State Historic Park.

Response GO14-128 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO14-117 for discussion of the how the Draft EIR assessed potential visual impacts to scenic vistas in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, and the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Refer to Response GO14-127 for discussion of the aesthetic impacts of the proposed Project to the Los Angeles State Park, which would be less than significant, including to scenic vistas. The Draft EIR recognized the potential visual impact that could occur as a result of the addition of Chinatown/State Park Station, noting that its 98-foot height could alter changes to views as compared to the existing landscape. However, the analysis conducted for LU-4 explained that the design of Chinatown/State Park Station would include architectural styles, colors, and materials that are comparable and similar to the aesthetic make-up of the surrounding urban environment. The design also includes the addition Park amenities including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Pedestrian access enhancements included in the proposed Project would include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station, including hardscape and landscape improvements, shade structures, and potential seating. The Chinatown/State Park Station would also include the installation of landscaping and hardscaping at the southern entrance to the park along Spring Street which currently just includes hardscaping. Overall, the design would ensure the addition of Chinatown/State Park Station would not substantially degrade the existing visual quality or public views of the site and its surroundings, and the impact would be less than significant. As detailed in Section 3.01 and Appendix C, the LUs along the proposed Project alignment encompassed the location of the proposed Project alignment and the adjacent area. The existing visual character and quality, as well as the primary viewers, were determined for each LU. Locations of sensitive viewers are identified on Figures 4-2 through 4-4 of Appendix C. As noted in Appendix C, not all sensitive viewers would have views of the proposed Project or be visually impacted by the Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Recreationalists in Elysian Park are not identified as sensitive viewers of the proposed Project. Moreover, as discussed in Section 3.01, there are no designated scenic vistas present in the API. However, the Project area provides views that are considered scenic to certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. To the extent a recreationalist in Elysian Park could experience minor changes in views based on the Chinatown/State Park Station, this would be only minimally notable because of the distance aspect of that view and intervening development and the presence of vegetation. As discussed in Section 3.01, Aesthetics, of the Draft EIR, views from recreationalists within Elysian Park may experience minor changes to views of Dodger Stadium but this would be only minimally noticeable because of the distance aspect of that view and the presence of vegetation.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Mitigation Measure Aes-1.

Refer to Section 6.0, Design and Use Options, of the Draft EIR, for discussion of Design Option C, Chinatown/State Park Station with Increased Height, which would include a 35 foot increase of the Chinatown/State Park Station for a 133 foot-tall station, included in the Draft EIR in response to stakeholder feedback who asked the Project Sponsor to consider a taller Chinatown/State Park Station to increase the height of cabins entering and exiting the station along Spring Street. Refer to Figures 6-16 through 6-18 for simulations of Design Option C compared to the proposed Project, and accompanying discussion of the aesthetic impacts of this design option, which would be less than significant.

Comment GO14-129 The discussion above does not include consideration that to install the massive Chinatown/State Park Station removal of a substantial number of trees will be necessary. The DEIR describes that the Park includes "mature trees" (DEIR, p. 3.1-24), but the only significant discussion of trees in the aesthetic impact analysis of LA State Historic Park describes how "existing views of downtown from other areas within the park are already interrupted under existing conditions by trees…," ignoring that the trees in the Park are themselves an aesthetic resource, and entirely neglecting that 24 trees on the State Historic Park property and six street trees adjacent to the Park would be removed to allow construction of the Chinatown/State Park Station, and an additional 51 trees would be removed to accommodate the gondola alignment over the Park. (DEIR, p. 3.4-23.)

The aesthetic analysis does not consider the function of trees within the Park landscape that would be removed. For example, are they part of the Park General Plan and Final EIR mitigation that screens and softens the visual impact of adjacent urban areas using vegetation? The aesthetic analysis, in fact, entirely ignores the removal of these 81 trees. They are in the way of the Project component and alignment, so they will be removed without respect to their age, purpose, or aesthetic or habitat value. No trees can be planted in their place within the gondola alignment—they would interfere with the Project.

In a letter to the editor recently published in the Los Angeles Times, Kathleen Johnson, executive director of Los Angeles River State Parks Partners, a "cooperating association" for LA State Historic Park, justifiably refers to the gondola Project's removal of trees and taking of parkland as an "environmental injustice."[56] LA Parks Alliance agrees.

Footnote 56: Kathleen Johnson, Damaging a hard-won park (LA Times letter to the editor), published Jan. 11, 2023, attached as Exhibit R. (More information on LA

River State Parks Partners, including its "cooperating association" status with state parks, is available at its website: https://www.larsppartners.org.)

Response GO14-129 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response GO14-117 for discussion of the how the Draft EIR assessed potential visual impacts to scenic vistas in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR. The Draft EIR addressed aesthetic impacts in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment of the Draft EIR, and determined that impacts would be less than significant. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. Section 3.01 includes detail regarding existing trees as part of the Local Setting and discusses tree removal and replacement. The Draft EIR includes thirty Key Observation Points (KOPs), including nine that simulate views of or from Los Angeles State Historic Park. In addition, refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the KOPs analyzed in the Draft EIR include the removal of landscape planting elements, including trees. Additionally, refer to Appendix H.2, Supplemental KOPs in Response to Comments, which includes additional KOPs 31 through 35 that provide additional visual simulations of Los Angeles State Historic park, including views from a cabin over the park, views of the Chinatown/State Park Station, and proposed amenities for the Park. Moreover, as discussed on page 20 of the Tree Report, which is included in Appendix E, Biological Resources Assessment, of the Draft EIR, and in Appendix K.1, Updated Tree Report, of the Final EIR, the trees within the Los Angeles State Historic Park were installed in 2016 during construction of the Park as part of a tree planting program and are not naturally occurring. Further, as described in BIO-PDF-F, the proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, which require tree replacement at least at a 1:1 ratio.

Section 3.11, Land Use and Planning, of the Draft EIR also analyzed the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics (see pages 3.11-39 to 3.11-41). As detailed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, consistent with the General Plan's Aesthetic Goal, the proposed Project would protect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources. The proposed Project's design would incorporate appropriate urban design elements at the neighborhood level, preserve natural viewsheds of hillside areas, as well as protect additional open space and aesthetics resources consistent with policies from the Los Angeles State Historic Park General Plan.

The proposed Project's design and building materials would complement the architectural themes of the neighborhood and would complement the visual character of the existing buildings in the area. The Chinatown/State Parks Station's location would not block any designated scenic vistas, alter scenic resources, or block panoramic views. Additionally, potential impacts to visual quality and character are minimized by the location of the Chinatown/State Park Station, which is in the southernmost portion of the park, away from the open passive park areas.

The proposed Project components would consist of a modern architectural design, which would complement the existing modern style buildings in this area. In addition, the neutral light-tone gray of the proposed Project components would be consistent with modern structures in the surrounding urban environment. The new amenity building intended for use by proposed Project riders and park visitors alike are designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Further, consistent with Los Angeles State Historic Park General Plan Aesthetic Guideline 1, the Project Sponsor has taken steps to further minimize the effects of the proposed Project on the park's visual resources and high-value open space. This has included collaboration with State Parks resulting in selecting a primary alignment along the western edge of Los Angeles State Historic Park, rather than through the middle of the park, in order to reduce visual and other Park impacts. Additionally, the Project Sponsor worked with State Parks to determine the new location of the Chinatown/State Park Station to improve pedestrian flow into the park and what other improvements would further enhance the experience of visitors (e.g., increased landscaping and hardscaping, new restrooms and concession areas, etc.). This resulted in moving the station to the southernmost edge of the park.

As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on Los Angeles State Historic Park, including reducing the size and scale of the station, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page

3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of certain trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. In the short-term, the removal of trees would result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relatively to the amount of habitat available in surrounding areas.

This response takes into account the content of Exhibit R, referenced in this comment. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system.

Comment GO14-130 3. The DEIR's analysis of Project lighting impacts is incomplete.

The DEIR includes a Lighting Study. (DEIR, Appx. C). The study is incomplete for failure to consider the totality of the Project's proposed signage program, which "may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising… Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins." (DEIR, p. 2-45.) The Lighting Study

neither discusses this nor provides additional information regarding the signage program.

Response GO14-130 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. No digital signage is proposed on the exterior of the cabins. Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes KOPs updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study.

Comment GO14-131 The DEIR fails to consider the specific impacts of lighting and glare on views from and of LA State Historic Park protected aesthetic resources. As the Park's General Plan Final EIR states: "Inappropriate lighting throughout the Park may create visual impacts. Obstructing an existing viewshed (such as the Los Angeles downtown skyline) may be considered an adverse impact."

Thus, lighting or glare created or made worse by any Project component, including its gondola cabins, which the signage program acknowledges may include electronic digital displays integrated into the design of stations, towers, and cabins, must be considered in the DEIR. But the DEIR relies only on the City of Los Angeles municipal code, which is subject to change, to protect LA State Historic Park, even though the Park is also (and better) protected by the Park's General Plan and Final EIR, which requires minimizing or eliminating inappropriate lighting. As Project cabins traverse the airspace of the Park lighting from within the gondola cabins, lighting from digital displays, lighting of traditional advertising, reflection of light from other sources, even unlit cabins traveling across the nighttime backlit skyline, could constitute potentially significant environmental effects of the Project. The DEIR studies none of them.

The DEIR's lighting analysis is incomplete and therefore inadequate. The Final EIR must include a mitigation to ensure gondolas are not vehicles for electronic digital display advertising that would cause a significant light/glare impact at LA State Historic Park. (Additional criticism of the DEIR's inadequate lighting analysis is found in Exhibit S (LPP letter), supra p. 64 fn. 59, pp. 6-7. LA Parks Alliance adopts these concerns as if fully set forth herein.)

Response GO14-131 Refer to Section 3.01, Aesthetics, and the Lighting Study included in Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the impacts to light and glare of the proposed Project, which would be less than significant. Refer to Response P708 for responses to the comments raised in Exhibit S, referenced in this comment. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of the proposed Project's consistency with applicable Los Angeles State

Historic Park General Plan policies, including aesthetic goals to protect existing viewsheds. The Draft EIR addressed aesthetic impacts in Section 3.1 Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment, of the Draft EIR. Project lighting would include low-level lighting for security and wayfinding purposes. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable Los Angeles Municipal Code lighting standards. Refer to Topical Response K, Signage and Lighting, for discussion of how there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. No digital signage is proposed on the exterior of the cabins.

Comment GO14-132 4. The Shading Impact analysis discloses a significant but unmitigated impact at LA State Historic Park.

The DEIR describes that the LA CEQA Thresholds Guide considers shading impacts of more than three hours between the hours of 9:00 am and 3:00 pm Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 am and 5:00 pm Pacific Daylight Time between early April and late October, to be a significant impact. (DEIR, Appx. C, pdf p. 94.) It goes on to describe shading impacts of shade-sensitive uses during winter months at LA State Historic Park as being significant under the DEIR's threshold:

> Fall shadow diagrams for the proposed Chinatown/State Park Station are depicted on Figure 72 through Figure 76 of Appendix B. A small segment of the western walkway in and near the southern entrance of Los Angeles State Historic Park would be shaded for four hours from 9:00 a.m. to 1:00 p.m. A small segment of walkways in the eastern side of the park would be shaded for four hours from 12:00 p.m. to 4:00 p.m. …[57]
>
> [T]he proposed Chinatown/State Park Station would result in the shading of shade-sensitive uses for more than three hours between the hours of 9:00 a.m. and 4:00 p.m. Pacific Standard Time (between late October and early April) in the Winter. Small portions of the eastern and western walkways and park green space near the southern entrance of the park would be shaded by the proposed Chinatown/State Park Station in the Winter."
>
> (Ibid., pdf p. 98.)

Despite fitting within the DEIR's chosen threshold to find a significant shading impact, the DEIR nonetheless concludes that the shadow impacts due to construction of Chinatown/State Park Station would be less than significant even

though it provides no mitigation measures to lessen the significant impact. (Ibid., pdf pp. 98-99.) The aesthetic analysis is therefore inadequate for identifying a significant impact under the threshold but determining it not to be significant, as well as for failing to propose a mitigation measure to reduce or eliminate the adverse impact.

Footnote 57: LA Parks Alliance notes that the main DEIR document neglects to mention the four-hour shading impact between 9:00 am to 1:00 pm detailed in Appendix C. (DEIR, p. 3.1-55.)

Response GO14-132 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Shading is not a required analysis area under Appendix G of the CEQA Guidelines; however, a shadow analysis was conducted as part of the Visual Impact Assessment per recommendations in the L.A. CEQA Thresholds Guide, which provides that a determination of significance shall be made on a case-by-case basis, considering the factors provided in Section 3.2.2, L.A. CEQA Thresholds Guide, of the Draft EIR, including shading. As described in Section 3.01, the proposed Chinatown/State Park Station would result in the shading of shade-sensitive uses for more than three hours between the hours of 9:00 a.m. and 4:00 p.m. Pacific Standard Time (between late October and early April) in the Winter. Small portions of the eastern and western walkways and park green space near the southern entrance of the park would be shaded by the proposed Chinatown/State Park Station in the Winter. These park-related areas would be directly adjacent to the proposed station and are also considered to be a part of the proposed Project site. The Los Angeles State Historic Park is an urban park in a highly developed area and includes a total of approximately 32 acres of passive recreation including expansive additional areas of walkways and open green space for patrons to use. The relatively small areas of park walkways and green spaces that would receive shading from the proposed station are considered to be elements of the southern entrance to the park, but not routinely useable outdoor spaces. In addition, the outdoor seating area associated with the Cargo Snack Shack, which would receive shading for only two hours, currently includes an overhead shade canopy, so the proposed Project would not shade an uncovered outdoor seating area. As such, these impacts are not considered to be significant for these reasons. Also, the proposed Chinatown/State Park Station would not result in the shading of shade-sensitive uses for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). As such, shadow impacts from the Chinatown/State Park Station would be less than significant. Because there is no significant environmental impact from shading, no mitigation is required.

Comment GO14-133 E. The DEIR's analysis of the Project's potentially significant impacts to biological resources is incomplete and inadequate.

The DEIR provides the essential background on the regulatory setting for protection of biological resources (DEIR, pp. 3.4-1 to 3.4-4) but nonetheless fails to perform an adequate analysis of potentially significant impacts in the Project area.

The DEIR's wildlife survey concludes that only a limited number of bird species are found in the biological survey area, including ten common species and three non-native species. (DEIR, pp. 3.4-10 to 3.4-11.) But the DEIR limited the survey area to only "the proposed aerial alignment, stations, junctions, towers, cabins, and cables, and a 500-foot survey buffer around the alignment." (DEIR, p. 3.4-13.) Because the Project will cause direct physical changes and also foreseeable indirect physical changes in the environment beyond the 500-foot survey buffer area, in particular in Los Angeles State Historic Park, this survey area was too small to capture the full extent of potentially significant biological resource impacts.[58]

The DEIR describes two field surveys having been performed. The first survey was conducted April 1, 2020, "to document and photograph existing biological resources" and included a survey of "tall structures such as mature trees, power poles and towers, billboards, and buildings" searching for the "presence of nests." (DEIR, p. 3.4-14.) A second "follow-up" survey was conducted on April 24, 2021, an entire year later, "to verify and record tree species occurring in the Project component footprints," though apparently not to survey for the presence of additional wildlife species that may not have been present during the 2020 survey. (Ibid.)

The DEIR notes: "Raptor species such as red-tailed hawk, Cooper's hawk, great horned owl, American crow, and common raven are known to use tall structures as nesting sites in urban environments." It continues: "Red-tailed hawk were observed flying in the vicinity of Dodger Stadium during the 2021 survey." (Ibid., p. 3.4-11 (latin species names omitted.)) The DEIR found no raptor nests but noted "[i]ndications of songbird nesting activities were detected during the 2021 survey in the Los Angeles State Historic Park." The DEIR also stated that while "[n]o active tests were detected," "ornamental landscaping, including mature trees throughout the [biological survey area], provide potentially suitable nesting habitat for songbirds and raptors." (Id.) The DEIR's summary is consistent with the full biological resource assessment found in DEIR, Appendix E. (See DEIR, Appx. E, pdf p. 44.)

A comment letter from Land Protection Partners explains why the biological survey area used by the DEIR is inadequate.[59] LA Parks Alliance adopts the Land Protection Partners letter as its own position, and requests that Metro respond to the entire letter as if fully set forth herein.

The biological survey area should have extended "up to 200 feet upward from the alignment" and included sufficient range to include birds within a reasonable distance of the alignment, since typical songbirds fly at a rate of 30 miles per hour (meaning they would cross the entire study area in "less than 23 seconds"). (LPP letter, p. 2.) It should also have not been completed in a single daytime session. The LPP letter explains that "a single daytime survey in April cannot describe the volume and diversity of migratory birds that traverse the project location at night…during spring and fall migrations," and such a limited survey is inadequate and cannot be considered substantial evidence to support the DEIR's conclusions. (Ibid.)

Footnote 58: See Figure 4, DEIR, Appx. E, pdf p. 26, showing the area of the biological survey area, leaving out more than half of Los Angeles State Historic Park from the survey area.

Footnote 59: Travis Longcore, Ph.D & Catherine Rich, J.D., M.A., letter to Cory Zelmer re LA Aerial Rapid Transit Project ("LPP letter"), Jan. 16, 2023, attached as Exhibit S.

Response GO14-133 Refer to Response P708 for responses to the comments raised in Exhibit S, referenced in this comment. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of impacts from the proposed Project to biological resources. As stated on pages 3.4-12 and 3.4-13 of Section 3.04 Biological Resources, of the Draft EIR, 39 special-status wildlife species were identified by the CNDDB database to have historically been recorded from the Los Angeles and surrounding eight quadrangles. Nine of those species were historically recorded within the biological study area (BSA) for the project. However, of the nine species with observations from within the BSA, the most recent are for bat species from 25 to 30 years ago. All other observations are 50 years old or older. Based on this publicly available data, the Draft EIR found that impacts to special status species would be less than significant with incorporation of mitigation measures BIO-A and BIO-B to reduce potential impacts to bats and nesting birds especially since the habitat in the area has been drastically modified so as not to be useful to special status species since the species were recorded.

As stated on page 3.4-13, the 500-foot buffer was determined to be suitable for biological surveys as it is anticipated that indirect impacts beyond 500 feet in the existing environment would be diffuse and insignificant. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow-up survey focused on tree species occurring on April 24, 2021. As discussed in Section 3.04, Biological Resources, of the Draft EIR, during the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity, and potential bird nest sites were conducted using binoculars.

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for further discussion of the survey efforts in the BSA and the appropriate size of the BSA. As discussed in Appendix G, although the Draft EIR lists the species detected during the surveys, and states that these are common species, it does not conclude that the observed species are the only ones assumed to use the BSA, nor that sensitive species never occur in the BSA. Although additional surveys could increase the number of species detected, even exhaustive surveys may not result in detections of sensitive species that occur on site only occasionally. Nonetheless, a third field survey was performed March 23, 2023, to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. During this visit, two biologists surveyed the BSA over a 4.5-hour period (11:00 AM to 3:30 PM) and observed 17 bird species and 2 mammal species. The BSA encompasses a 500-foot buffer around the proposed Project alignment. Habitats and wildlife occurring outside of this 500-foot buffer were considered to be a sufficient distance away to not be affected by construction or operation of the proposed Project.

Comment GO14-134 1. The DEIR's analysis of potentially significant biological impacts due to bird collisions is inadequate and not supported by substantial evidence.

The DEIR minimizes the risk of operational impacts in the form of bird collisions with the proposed stations, junctions, towers, cabins, and ropeway cables, finding that "[s]ignificant impacts typically occur when towers or wires are constructed in migratory corridors and obstruct the flight paths of migrant birds." (DEIR, p. 3.4-18.) The DEIR asserts that because the proposed Project is "not in or near a known avian migratory corridor and lacks habitat and topographic features that would promote concentrated avian migratory activity" impacts to migratory birds would be less than significant. (DEIR, pp. 3.4-18 to 3.4-19.)

The DEIR explains that collisions with resident or migrant birds using habitat areas found in the biological resource area would be able to detect and avoid collisions with larger physical components of the Project (e.g., stations, towers, and cabins). (DEIR, p. 3.4-19.) The DEIR asserts that bird strikes with gondola cable systems would be unlikely, because compared to power transmission lines, gondola cables are much larger ("1.75 to 2.5 inches in diameter" compared to only "1 to 2 inches in diameter" for transmission lines, and only "0.4 to 0.5 inches in diameter" for shield wires). (Id.)

There are two problems with this analysis. First, it appears to be unsupported by substantial evidence. Appendix E of the DEIR does cite a paper by Bernardino, et al., explaining that "[p]owerline-specific factors" such as wire diameter and the number of vertical wire levels are factors that "may provide insights about the potential for birds to collide with ropeway cables." (DEIR, Appx. E, pdf p. 52 (emphasis added).)[60] That such factors may be relevant does not justify evading an

actual analysis of the potentially significant environmental impact of deadly bird collisions. In fact, the cited paper notes "there is comparatively little scientific evidence for power line-specific factors, namely what is the impact of the number of vertical levels, or wire height and diameter." (Bernardino, supra fn. 59 (emphasis added).) This is precisely the opposite of the meaning imputed to the paper by the DEIR.

"[T]here is evidence that power line collision mortality can even lead to changes in migratory patterns and flyways." (Bernadino, citing Palacín et al., 2017). This may explain, in part, the DEIR comment that the Project area is not on a known migratory route. The cited paper also notes "collision as the most widespread interaction" between birds and infrastructure such as the Project. The Bernardino paper explains that "virtually any aerial wire can pose an obstacle to flying birds." (Ibid. (emphasis added).)[61]

Footnote 60: Citing J. Bernardino, et al., Bird collisions with power lines: State of the art and priority areas for research (hereafter "Bernadino"), Biological Conservation, 222: 1-13 (2018), available at: https://www.sciencedirect.com/science/article/abs/pii/S0006320717317925.

Footnote 61: The DEIR's "state of the art" article (section 3.4, footnote 17) dates to 2012. The 2018 Bernardino article's purpose is to update the state of the art on bird collisions with power lines based on much newer studies and to "identify major knowledge gaps that should be the subject of subsequent research." (Id.)

Response GO14-134 Refer to Section 3.04 Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow up survey focused on tree species occurring on April 24, 2021. During the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity and potential bird nest sites were conducted using binoculars. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of additional survey efforts and how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project are likely to present a lower risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. As discussed in Appendix G, shield wires are placed on transmission lines to protect the lines from lightning strikes, but in effect add an additional plane that can contribute to bird strikes. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support

and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines.

Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. In addition, the proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet agl, whereas the proposed Project component heights are all below 200 feet agl. Section 3.04, Biological Resources, of the Draft EIR—as further supported in Appendix G, of the Final EIR—states that migrant birds would pass over the alignment, and there is potential for birds to interact with ropeway cables when flying below 175 feet agl and towers when flying below 200 feet agl.

As discussed in Appendix G, there are limited empirical data available on avian collision with gondola cables, particularly in urban environments. A review of the literature since the publication of the Draft EIR provided no new information on this topic. However, as discussed in Appendix B to Appendix G, Memorandum from Doppelmayr Regarding Comparable System Bird Strikes, Doppelmayr USA, one of two manufacturers of 3S gondola systems in the world, noted that a similar 3S gondola project measuring about 0.5-mile long and spanning the Rhine River in an urban environment in Koblenz, Germany was recently approved for an extension of their operating permit after the first 3 years of operation, noting that no bird strikes were detected during that period.

Comment GO14-135 Second, the gondola cables are viewed by the DEIR as very large for purposes of considering their risk to bird strikes. (DEIR, p. 3.4-19.) But these very same cables are considered insignificant in the Project's aesthetic analysis, because "they have similar characteristics to the overhead powerlines that are prevalent in views in this area. As such, the proposed cables would not significantly impact views in this

area." (DEIR, p. 3.1-37.) The gondola cables seem to have the perfect goldilocks size: they are deemed to be small (like powerlines) when it comes to assessing their visual impact (notwithstanding that they are not in the distance, but directly overhead within LA State Historic Park), but so large (unlike powerlines) that birds will have no difficulty in seeing them.

Response GO14-135 Refer to Response GO14-134 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Refer to Response GO14-126 for discussion of the aesthetic impacts of the cables for the proposed Project, which would be less than significant. As discussed in Appendix G, Supplemental Biological Resources Report, of the Final EIR, most birds have far higher levels of visual acuity than humans, and can resolve movement much faster than humans. Most diurnal birds have a much higher concentration of rods and cones in their eyes than humans, and their retinal structure allows for resolution of movement above 100 hertz, compared to 60 hertz for humans. Birds are therefore capable of detecting objects from much farther away than humans and can react to objects appearing in their visual field much more rapidly than humans. In addition, the cables will be approximately between 46 and 175 feet above ground level (agl), relatively far from the perspective of most humans in the vicinity of the proposed Project. For these reasons, the visual disturbance posed to humans from cables of a given diameter is not directly comparable with the detectability of the same cables to birds flying near the cables. In addition, most nocturnal avian flight occurs during migration, when birds usually fly thousands of feet above ground level, whereas the proposed Project component heights are all below 200 feet at ground level.

Comment GO14-136 In addition, it is well-known that bright lights such as those at a sports stadium like Dodger Stadium frequently attract birds.[62] The proposed Project would be constructed between Dodger Stadium and the Los Angeles River, home to an ever-expanding presence of waterfowl and other birds. In addition, LA State Historic Park's easternmost area very near the river provides additional habitat for birds and wildlife. As discussed above, these areas should have been included in the biological survey area but were not.

Footnote 62: See, e.g., Valerie Fellows, Dim the Lights for Birds at Night!, US Fish & Wildlife Service, Apr. 28, 2022, available at: https://www.fws.gov/story/2022-04/dim-lights-birds-night.

Response GO14-136 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR for discussion of potential impacts to migratory birds during both construction and operation of the proposed Project. As stated on page 3.4-19 in Section 3.04, Biological Resources, of the Draft EIR, proposed Project lighting would be low-level and primarily integrated into the architectural features. Additionally, exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and

bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the proposed Project is not anticipated to have an indirect impact on bird and bat species. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin. Furthermore, lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. If lighting at stadiums were a major attractant to birds during migration, there should be many more examples of this phenomenon, given the large number of professional sports (e.g., baseball, football, soccer), and concert events that occur at such venues at night during spring and fall migratory periods.

Comment GO14-137 The Land Protection Partners letter addresses the above points and others in far greater detail than the DEIR. The LPP letter notes that the DEIR arguments and conclusions regarding cable size, cable spacing, alleged increased visibility of three cables, relative risk compared to transmission lines, concentration of avian movement, and artificial light in the Project area, among other things, are incorrect and unsupported by substantial evidence. The letter details specific species that are particularly susceptible to collision that are found in the Project area. The letter finds that the DEIR misrepresents the scientific literature and that the Project will result in a significant number of bird kills, an impact that cannot be mitigated. (LPP letter, pp. 2-5.) Unlike the DEIR, the letter is supported by substantial evidence throughout.

Response GO14-137 Refer to Responses P708-1 through P708-19 for responses to the comment letter from Land Protection Partners referenced in this comment.

Comment GO14-138 As one example of the kind of species that might be impacted by the gondola cables, drawn towards Dodger Stadium by its bright stadium lights, last fall during the 2022 MLB playoffs between the Los Angeles Dodgers and San Diego Padres, a large goose flew onto the field, interrupting the game for a time before it was eventually captured, removed from the field, and ultimately released to an undisclosed location.

Travis Longcore, president of the Los Angeles Audubon Society and an adjunct professor at UCLA, identified the bird as a greater white-fronted goose. An article in the Los Angeles Times explained the occurrence:[63]

[Greater white-fronted geese] are known to migrate from the Arctic tundra in Alaska, where they breed in the summer, and fly south in the fall along the Pacific, settling in the wetlands in the Central Valley of California or even farther south into Mexico, a flight pattern the birds have carried out for thousands of years, Longcore said.

The bird on Wednesday was probably following this migration pattern when it became distracted by the stadium lights that tower above Chavez Ravine, a

common obstacle for migrating birds, said Longcore, whose research includes the effects of light pollution on migratory birds.

Greater white-fronted goose from article, Wally Skalij / Los Angeles Times

The article later continues:

Most white-fronted geese are spotted along bodies of water, such as lakes at MacArthur and Echo parks, at the L.A. River, or in the wetlands of Playa del Rey or the South Bay, Longcore said. The goose Wednesday would have been accustomed to landing in water, which would explain its hard landing on the field, he said.

Bird enthusiasts have been buzzing online in recent weeks about large flocks of greater white-fronted geese spotted throughout coastal Southern California, said Kimball Garrett, a researcher at the Natural History Museum of Los Angeles County.

The failure of the DEIR to fully evaluate the risk to migratory and other birds or to support its conclusions with substantial evidence must be corrected, and the DEIR revised and recirculated for additional public comment.

Footnote 63: See Jonah Valdez, What happened to the goose that stole all the attention at Dodgers playoff game?, LA Times, Oct. 13, 2022, available at: https://www.latimes.com/sports/dodgers/story/2022-10-13/whathappened-to-the-goose-at-dodger-stadium-experts-say-its-a-rare-species-from-alaska.

Response GO14-138 Refer to Response GO14-136 for discussion of how lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. The occurrence of the greater white-fronted goose that landed at Dodger Stadium in October 2022 is not an indication of a widespread phenomenon.

Comment GO14-139 2. The Project design is likely to result in large Rock Pigeon roosts.

As discussed in the Land Protection Partners letter, the DEIR includes depictions that show station structures with large open canopies with exposed structural beams and girders. (See, e.g., Figure 2-5, DEIR p. 2-15; cover image, DEIR, Appx. C; Figure 5-4, DEIR, Appx. C, p. A-4.) This design is "likely to result in large Rock Pigeon roosts" which is likely to necessitate "chemical and/or physical methods that would be used to exclude pigeons from roosting within these structures," a potentially significant environmental effect of the Project that is not disclosed in the DEIR. (LPP letter, pp. 7-8.)

Response GO14-139 Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of methods to prevent roosting or nesting opportunities for pigeons. There are numerous non-chemical and non-lethal anti-perching devices (e.g., Nixalite® bird spikes) that can be installed to prevent birds from becoming established. Chemical methods of pigeon removal or control would be avoided. It is also worth noting that the surrounding area contains numerous potential roosting and nesting opportunities (e.g., in the nearby buildings and billboard signs), and that the stations and junction themselves would not be drawing pigeons into the area and concentrating them above current levels. Refer to Section 5.0, Corrections and Additions, as in response to comments, the proposed Project has committed to implementing BIO-PDF-D and avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

Comment GO14-140 3. The Least Bell's Vireo, an endangered species, has been sighted in LA State Historic Park; the DEIR must re-evaluate its faulty conclusion of no Project impacts to protected wildlife species.

The DEIR states: "Because the BSA [biological survey area] has been completely disturbed during urban development and consists of roadways, sidewalks, buildings, and rail tracks, habitats preferred by regional special-status wildlife species are not present (refer to Appendix A, Table B)." (DEIR, Appx. E, pdf p. 47.) The "least Bell's vireo" is specifically called out in the DEIR as one of 39 special-status species identified in the California Natural Diversity Database (CNDDB) "to have historically been recorded from the Los Angeles surrounding eight quadrangles, and from a search of IPaC for the Project area." (Ibid., pdf pp. 45-46.) The DEIR notes that "[t]here are no CNDDB records of any federal or State-listed wildlife species from the BSA in over 100 years" and concludes: "The BSA does not provide habitat potentially suitable for any of the regional special-status wildlife species identified during the literature review. The Project area has been completely disturbed and the native habitats these species are known from have long been removed from the BSA." (Ibid., pdf. p. 46.)

Notwithstanding the DEIR's conclusions, a male least Bell's vireo was recently surveyed in LA State Historic Park on May 24, 2022, by UCLA Institute of the Environment and Sustainability doctoral student, Jenny Aleman-Zometa.[64] Ms. Aleman-Zometa's doctoral work includes researching the way birds use local parkland, particularly parks sited on former brownfields such as LA State Historic Park, to learn the beneficial impact of these parks on species diversity. Ms. Aleman-Zometa took several images and a short video of the least Bell's vireo during her survey.

The images and video of the least Bell's vireo have been reviewed by leading ornithologists, who confirmed the species' identification and noted that its birdsong is evidence of a "pioneering male" beginning to use LA State Historic Park as habitat. Given this clear evidence of a protected special-status endangered species surveyed recently at LA State Historic Park, the question is what impact the proposed Project might have on this protected species listed as endangered under both state and federal law. The DEIR has not considered this question.

Least Bell's Vireo in LA State Historic Park, May 24, 2022 / courtesy Jenny Aleman-Zometa[65]

Footnote 64: Telephone interview with Jenny Aleman-Zometa, doctoral student, UCLA Institute of the Environment and Sustainability, Jan. 13, 2023. See also https://www.ioes.ucla.edu/person/jenny-aleman-zometa/.

Footnote 65: Full format images and video are available on request and will be temporarily available at: https://www.dropbox.com/sh/m1wzhkbvf9md5g5/AADgRm_LqbvwA0imlevui3KNa?dl=0.

Response GO14-140 The Draft EIR addressed impacts to biological resources, including special status species like least Bell's vireo, in Section 3.04, Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. No least Bell's Vireo were detected during the two initial surveys for the Biological Resources Assessment in the Draft EIR. As indicated on page 3.4-13 of Section 3.04, Biological Resources of the Draft EIR, an observation of least Bell's vireo was recorded in the proposed Project area from more than 50 years ago. Based on this publicly available data, the Draft EIR found that impacts to special status species,

including least Bell's Vireo, would be less than significant with the incorporation of Mitigation Measure BIO-B to reduce potential impacts to bats and nesting birds. Further, refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of how the BSA was surveyed again on March 23, 2023 in response to this comment, and no suitable least Bell's vireo habitat was present. There is a small managed area at the eastern end of the Los Angeles State Historic Park that includes some riparian plants and a depression where water collects during wet periods. These are features consistent with least Bell's vireo breeding habitat. However, at best, this habitat would be considered marginally suitable breeding habitat for least Bell's vireos, due to the small patch size and distance to the nearest perennial water source (approximately 1,000 feet from the Los Angeles River). The patch of habitat at the eastern end of the Los Angeles State Historic Park is more than 500 feet outside of the BSA, and more than 1,000 feet away from the proposed Project alignment, where Project construction would occur. It is well beyond the distance of any expected direct or indirect impacts associated with the proposed Project. Both the CDFW (2022) and U.S. Fish and Wildlife Service ([USFWS] 2014) recommend 500-foot disturbance buffers for least Bell's vireos, with protocol surveys in suitable habitat within 500 feet of proposed construction areas. This is, in part, why the 500-foot distance was selected for the BSA. The habitat in question is more than 1,000 feet from proposed Project construction areas, and therefore no impacts to wildlife in that area are expected. Due to the absence of suitable least Bell's vireo breeding habitat in the BSA, least Bell's vireos are not expected to be present in the BSA.

Comment GO14-141 Ms. Aleman-Zometa's May 2022 survey at LA State Historic Park included observation of 35 native bird species. Within the Project alignment and 500-foot buffer she surveyed 16 species, including in the southwest part of the Park. Her survey included common species but also included migrating, wintering, and breeding bird species.

Response GO14-141 The Draft EIR addressed impacts to biological resources, including special-status wildlife species, in Section 3.04, Biological Resources, with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on pages 3.4-12 and 3.4-13 of Section 3.04, Biological Resources, of the Draft EIR, a total of 39 special-status wildlife species were identified by the CNDDB database to have historically been recorded from the Los Angeles and surrounding eight quadrangles. Nine of those species were historically recorded within the biological study area (BSA) for the proposed Project. However, of the nine species with observations from within the BSA, the most recent are for bat species from 25 to 30 years ago. All other observations are 50 years old or older. Based on this publicly available data, the Draft EIR found that impacts to special-status species would be less than significant with incorporation of Mitigation Measures BIO-A and BIO-B to reduce potential impacts to bats and nesting birds.

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for additional discussion of why the Project would not result in significant effects to migrating, wintering, or breeding bird species. As discussed in Appendix G, it is unclear from the information presented in this comment where the observations took place, and whether they were within or even near the proposed Project's BSA, and accordingly does not contradict the information provided in the Draft EIR.

Comment GO14-142 Even if the DEIR's biological survey area with a 500-foot buffer from the Project alignment were sufficient elsewhere, and it was not (see LPP letter, p. 2), it did not consider the need to expand in the area of LA State Historic Park due to direct and indirect physical changes in the environment at the Park due to the Project. Activities at LA State Historic Park that currently occur at the western side of the park in the vicinity of the proposed gondola alignment would be moved significantly eastward as a result of the Project, towards Park areas featuring significantly more wildlife habitat including, when there is sufficient rain as now, an intermittent riparian wetland area with willows and mulefat.[66] For example, the DEIR suggests that special event stages, currently located at the western edge of the Park, be moved toward the location of the Park's "Roundhouse" feature. (See DEIR, p. 5-62.) This particular suggestion is not feasible—the Roundhouse is a significant archaeological site at the Park and is inappropriate as stage location. Another location would have to be found for staging, likely further east where it is more likely to have an adverse impact on wildlife, including the endangered least Bell's vireo.

Footnote 66: That there is additional wildlife habitat at the Park's eastern side does not diminish the significant loss of habitat, including removal of 81 trees necessary for the Project as well as operation of the gondola, at the Park's western side. As Ms. Aleman-Zometa explained, "there is still a lot of diversity present at the western side of the Park where the gondola would be sited, and that will be adversely impacted."

Response GO14-142 As discussed in Appendix G, Supplemental Biological Resources Report, of the Final EIR, the area containing better quality wildlife habitat than the grassy lawns covering much of the rest of the Park are located more than 1,000 feet from the proposed Project alignment and more than 500 feet outside of the current BSA, and is accordingly located too far away from the proposed Project for construction or operation of the proposed Project to have an impact on potential habitat in this area. Moreover, the park and surrounding area is subject to high levels of disturbance on a regular basis, including concerts, music festivals, outdoor movies, and other events that regularly include high-amplitude speakers, food trucks, and large numbers of people. The habitat in the eastern end of the park is near streets with vehicular traffic, parking lots, and a walking path with regular human foot

traffic, in addition to the disturbances noted above. Therefore, birds and other wildlife using the habitat at the eastern end of the State Park should already be accustomed to high levels of disturbance. Further, Section 5.5.2, Special Events at the Los Angeles State Historic Park, of Section 5.0, Other CEQA Considerations, of the Draft EIR indicates that most events could still be held underneath or adjacent to the alignment, and that the proposed Project would not interfere with typical existing event stage locations (Figure 5-3). Therefore, it is unlikely that the proposed Project would result in a shift in park event activity towards the eastern end of the park, as the comment suggests.

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for additional discussion of why 500 feet was an appropriate buffer for the EIR to consider, for discussion of the proposed Project's potential affects impacts to least Bell's vireos, and for applicable tree replacement requirements in the City of Los Angeles.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. As discussed in Section 4.1.3, Impacts to Wildlife from Tree Removal, of Appendix G, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In addition, the total area of wooded habitat that would be removed at the Los Angeles State Historic Park is 0.24 acres. This area of wooded habitat is relatively small compared to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park. Accordingly, while the removal of trees will result in a marginal reduction of suitable tree habitat in the short-term, such habitat loss would not result in substantial population level impacts. Moreover, in the long-term, the replacement of trees proposed for removal would more than offset any realized impacts associated with the proposed Project.

Comment GO14-143 4. The DEIR fails to consider habitat and wildlife corridor impacts due to brush clearance activities at the Project's proposed Stadium Tower.

"If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed…" (CEQA Guidelines, § 15126.4, subd. (a)(1)(D), citing Stevens v. City of Glendale (1981) 125 Cal.App.3d 986.) The DEIR describes tree removal and brush clearance activities necessary in the area surrounding the Project's proposed Stadium Tower site. (DEIR, pp. ES-80 to ES-83 (describing Mitigation Measures WFR-1 and WFR-2).) The DEIR notes that at least 31 "significant" pursuant to City of Los Angeles regulations will be removed at the Stadium Tower site (10 significant trees for the Stadium Tower, and 21 additional significant trees for the Stadium Tower Fire Buffer Zone for Construction). (DEIR, Table 3.4-1, p. 3.4-23.)

The DEIR fails to consider whether removal of the significant trees or other brush clearance requirements may cause a potentially significant environmental effect on wildlife corridors or habitat in the Stadium Tower area. LA Parks Alliance recommends that Metro consult with the Santa Monica Mountains Conservancy as the appropriate Trustee agency with relevant expertise for wildlife corridors and habitat in the Santa Monica Mountains Zone for its advice with respect to determining whether the impact is significant, and if it is considered a significant impact, for appropriate mitigations to reduce the environmental impact to a level less than significant.[67]

Footnote 67: "[T]he Conservancy should be considered a trustee agency for any CEQA project which affects natural resources within the [Santa Monica Mountains] Zone." (Exhibit F, supra fn. 7 p. 3.)

Response GO14-143 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to pages 3.4-16 to 3.4-17, of Section 3.04, Biological Resources, of the Draft EIR, for discussion of potential habitat impacts related to tree removal and brush clearance. Refer to Table 4-1 of Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of applicable tree replacement requirements in the City of Los Angeles. As shown in this table, protected trees require a replacement ratio of 4:1, while significant trees require a mitigation ratio of 1:1. Removed "street trees" that occur in the public right-of-way (ROW) are to be replaced at a ratio specified by the Urban Forestry Division; typically, at a 2:1 ratio. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, it is anticipated that mitigation ratios for trees on land administered or managed by responsible agencies would be agreed to as part of the approvals required for implementation of the proposed Project. The proposed

Project would provide a minimum replacement ratio of 1:1 for all trees removed in the Los Angeles State Historic Park and a replacement ratio of 1:1 for all large trees removed in the State Route (SR) 110 California Department of Transportation (Caltrans) ROW. As discussed in Section 4.1.3, Impacts to Wildlife from Tree Removal and Brush Clearance, of Supplemental Biological Resources Report, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. Brush cleared from the fire buffer area surrounding the Stadium Tower location would be allowed to regenerate naturally after construction, subject to applicable defensible space requirements. In addition, the total area of wooded habitat that would be removed at the Stadium Tower Site is 1.02 acres. This area of wooded habitat is relatively small compared to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park. Accordingly, while the removal of trees or brush will result in a marginal reduction of suitable tree habitat in the short-term, such habitat loss would not result in substantial population level impacts. Moreover, in the long-term, the replacement of trees proposed for removal would more than offset any realized impacts associated with the proposed Project. As discussed in Response GO14-16, Santa Monica Mountains Conservancy ("SMMC") has no discretionary approval authority related to the proposed Project, however, Metro notified SMMC as a trustee agency.[20]

Comment GO14-144 F. The Project's Significant Historic and Cultural Impacts Must Be Properly Mitigated or Avoided.

1. Mitigation measures for sensitive cultural and historic resources are improperly deferred.

The DEIR describes many historic and cultural resources within the Project corridor that would be significantly impacted by the Project. These include Los Angeles Union Station, El Pueblo de Los Angeles Historic State Park, and Los Angeles State Historic Park, among other important resources. (DEIR, pp. 3.5-10 to 3.5-33.) The DEIR also identifies numerous important archaeological resources, which is unsurprising given the proposed Project's location within and near areas of first human settlement in the Los Angeles region, dating back as much as 10,000 years. (LASHP General Plan, pdf. p. 29.)

As described above, the Project has obvious aesthetic impacts at many of these sites. In addition, the DEIR describes significant impacts requiring mitigations at many other sites. Mitigations are necessary to protect specific cultural and archaeological resources at El Pueblo, including the Winery, the El Grito mural, and Avila Adobe (MM-VIB-A and MM-VIB-B, DEIR, pp. ES-33, ES-36, ES-67),

[20] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

archaeological resources generally (MM-CUL-A, DEIR, pp. ES-41 to ES-42, a mitigation measure relating to "all ground disturbance activities extending into native soils within known archaeological sites and other areas of high sensitivity") and to create an "Archaeological Resource Worker Training Program" (MM-CUL-B, DEIR, p. ES-44) and "Archaeological Testing Plans" (MM-CUL-C, for Alameda Station, DEIR, p. ES-45; MM-CULD, for LA Union Station; MM-CUL-E, for Los Angeles State Historic Park, DEIR, p. ES-48). If significant resources are found pursuant to MM-CUL-E, an additional mitigation would reconfigure planned improvements at LA State Historic Park. (MM-CUL-F, DEIR, p. ES-49.)

Response GO14-144 This comment provides a general recitation and characterization of the Draft EIR. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.5.4, Environmental Impacts, of Section 3.05, Cultural Resources, of the Draft EIR, for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe and The Winery), the El Grito mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.05, Cultural Resources, and Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR for a discussion of archaeological resources at the Los Angeles State Historic Park. As discussed in Section 3.05, the Chinatown/State Park Station footprint is entirely located within the boundary of Resource 19-003120 (consisting of the remains of the Southern Pacific Railroad's River Station). Extensive archaeological work has been conducted at the site, and when the Chinatown/State Park Station (including the construction staging area) is overlaid on an archaeological sensitivity map developed by California State Parks, it appears that the Chinatown/ State Park Station is located in an area not identified as low sensitivity for archaeological resources by State Parks. Nevertheless, with the implementation of mitigation, construction of the proposed Chinatown/State Park Station would result in a less than significant

impact related to a substantial adverse change in the significance of archaeological Resource 19-003120. Refer to Responses GO14-110 through GO14-127 for a discussion of the proposed Project's aesthetic impacts.

Comment GO14-145 LA Parks Alliance objects that all these mitigations are improperly deferred. Deferring mitigations is generally impermissible under CEQA. (See CEQA Guidelines, § 15126.4, subd. (a)(1)(B).) Particularly where, as here, known sensitive cultural and archaeological resources are within the impact area of the Project and could (indeed, are likely to be) harmed by construction activities, it is appropriate for mitigation measures to be fully formulated and subject to public review in advance of certification of the environmental document. To the extent that mitigation measures may require some additional study to be fully formulated, that study must occur now, before environmental review is completed and certified, and in advance of the commencement of any construction activities.

Response GO14-145 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. With respect to Mitigation Measures CUL-A and CUL-C through CUL-E, as acknowledged on page 3.5-2, Section 3.5, Cultural Resources, of the Draft EIR, "an archaeological resource may not be recognizable or even observable without ground-disturbing activities." Mitigation Measures CUL-A and CUL-C through E accordingly outline the specific actions that would be taken under the guidance of a qualified archaeologist in accordance applicable regulatory standards and/or in consultation with the applicable authorities in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture.

Comment GO14-146 Given the existence of at least one feasible alternative that eliminates or lessens virtually all the Project's potentially significant and significant and unavoidable impacts (DEIR, pp. ES- 19), it would be irresponsible to construct anything within archaeologically sensitive areas until the full extent of those resources are known, and if appropriate excavated or otherwise preserved and protected on site.

Response GO14-146 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR).

As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Topical Response H additionally outlines how environmental benefits of the proposed Project would not be realized through the "No Project Alternative", and how the Transportation Systems Management Alternative, noted as the "environmentally superior" alternative, for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment GO14-147 2. The DEIR ignored numerous NOP scoping comments urging protection of the "Monument to Sharing" artwork at LA State Historic Park

The Spring Street Alternative described in DEIR Chapter 4.0 "Alternatives" should not have been presented as a project alternative. As a project alternative that would have even greater impacts than the preferred alternative due to its location running directly through the center of Los Angeles State Historic Park, it is not an appropriate alternative, since it does not reduce environmental impacts. (Watsonville Pilots Assn. v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1087, citing CEQA Guidelines, § 15126.6, subd. (a).)

Numerous scoping comments discussed grave concern about a public artwork known as "Monument to Sharing" located at one of the entrances to LA State Historic Park that would be damaged by the Spring Street Alternative, presented as one of two alignment alternatives during the Project's scoping process. (See, e.g., DEIR, Appx. A, pp. 130-133, 140, 226, and 278, among others.) Despite the scoping comments, the discussion of the Spring Street Alternative does not mention aesthetic or cultural impacts to the "Monument to Sharing" artwork.

Response GO14-147 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. As discussed therein, the Spring Street Alignment Alternative would provide an ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system

accessible at LAUS. The Spring Street Alignment Alternative was included in the Draft EIR because it provides an aerial rapid transit option that would cross over the Los Angeles State Historic Park, and that maintained transit access to the Park and surrounding communities. Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint within the Los Angeles State Historic Park. As such, the Spring Street Alignment Alternative would not meet the following objective to the same extent as the proposed Project, and therefore, is considered to be only partially consistent with Objective 11 to "Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project." Consideration of the Spring Street Alignment Alternative complied with CEQA, which does not prohibit consideration of alternatives that would impede, to some degree, the attainment of the project objectives, or would be more costly. (CEQA Guidelines § 15126.6(a).) The proposed Project would not impact the Monument to Sharing, which is a grove of 32 orange trees in planters located near the Ann Street Entrance of Los Angeles State Historic Park on the south border along North Spring Street between Ann Street and Sotello Street. As discussed in Section 4.0, Alternatives, of the Draft EIR, if Metro elects to adopt the Spring Street Alternative rather than the proposed Project, and to the extent this Alternative would require relocation of the Monument to Sharing, the Project Sponsor would coordinate with State Parks and other stakeholders as to the potential relocation of the Monument to Sharing. Refer to Responses GO14-6 through GO14-12 for discussion of the comments on the NOP.

Comment GO14-148 G. Potential Dewatering May be Toxic and Require Mitigation.

The DEIR discusses groundwater conditions in the Project area as known to be toxic in the vicinity of construction activities proposed at Los Angeles State Historic Park. (DEIR, p. 3.10-26). Groundwater toxicity at other locations is "not specifically known." (Id.) The DEIR proposes Mitigation Measure HAZ-1 ("Prepare a Soil and Groundwater Management Plan") to address construction impacts:

> The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater to classify them as either hazardous or nonhazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. (DEIR, pp. ES-53 to ES-54.)

Response GO14-148 This comment provides a general recitation and characterization of the Draft EIR,. . Refer to Section 3.10, Hydrology and Water Quality, of the Draft EIR, for discussion of how, based on groundwater depths, none of the proposed excavations for foundations are anticipated to encounter groundwater; however, removal of

nuisance water that seeps into boreholes during construction may be required for the pile installations at each of the components. Groundwater may be encountered during installation of piles, and any nuisance water removed would need to be analyzed prior to disposal. Refer to Section 3.10, Hydrology and Water Quality, of the Draft EIR, at pages 3.10-26 and 3.10-27 for discussion of how detections of total petroleum hydrocarbons and volatile organic compounds, including BTEX, are known to be present in groundwater at the Los Angeles State Historic Park property, and, although the groundwater quality in the remainder of the Project study area is not specifically known, it may contain elevated levels of constituents such as petroleum hydrocarbons and solvents resulting from commercial and industrial discharges, in addition to potentially elevated TDS and metals related to natural conditions. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion regarding groundwater condition and requirements set forth in Mitigation Measure HAZ-A to complete a Soil and Groundwater Management Plan. Refer to Response GO14-149 for further discussion of Mitigation Measure HAZ-A.

Comment GO14-149 The DEIR describes construction activities as potentially requiring dewatering operations if "nuisance seepage from boreholes" or from excavation activities is encountered. (DEIR, pp. 3.10-26 to 3.10-27.) The Project will require deep piles at several Project component locations likely to be lower than the water table. (See Table 2-4, DEIR, p. 2-51, describing one drilled pile location of 80 feet and five drilled pile locations of 120 feet or greater; the Dodger Stadium Station drilled piles would be only 55 feet deep.)

LA Parks Alliance notes that in the EIR for Metro's Link Union Station, Metro proposed a series of mitigation measures to deal with dewatering operations, including dewatering for discharge of non-stormwater wastes.[68] While those proposed mitigations were also largely deferred, primarily requiring compliance with regulations and existing dewatering permits, it was Metro that would supervise and ensure that mitigations were properly enforced, not the Project's builder (whoever that turns out to be).[69]

Here, knowing of contaminated groundwater conditions very likely to exist in the Project area, Metro does not propose further groundwater testing of Project component areas to understand whether there will be a significant impact. Instead, Metro proposes deferring action until such time as hazardous conditions (i.e., significant impacts of the Project) are stumbled across during construction, long after the final EIR is certified. This is not permitted under CEQA. (CEQA Guidelines, § 15126.4, subd. (a)(1)(B).) The Project's mitigation measures should include pre-certification groundwater testing to understand the scope of potential impact and if determined to be significant, a pre-construction mitigation that lessens the impact to a level less than significant must be imposed.

Footnote 68: See Link Union Station – Draft EIR, Executive Summary, pp. ES-xlviii to ES-xlix, available at:

http://libraryarchives.metro.net/DPGTL/eirs/Link%20Union%20Station/2019-link-union-station-drafteir-executive-summary-english.pdf.

Footnote 69: In public statements, both ARTT LLC and Climate Resolve claim the Project will be donated to a new nonprofit, Zero Emissions Transit, which similarly has no experience building anything. See https://www.laart.la/faq/ and https://www.climateresolve.org/climate-resolve-launches-new-nonprofitfocused-on-zero-emission-transit-dodger-stadium-aerial-gondola-to-be-first-project/ (both last viewed Jan. 14, 2023). But in a sworn declaration of October 5, 2022, Principal Deputy Counsel, Ronald W. Stamm, Metro's counsel of record in recent litigation asserted that "ARTT's rights and obligations under [its agreement with Metro] cannot be assigned unless and until Metro approves the assignment…" and "[n]o assignment has been proposed yet." (LA Sup. Ct. Case No. 22STCP01030, Declaration of Ronald W. Stamm in Support of Respondent's and Real Party's Joint Opposition to Motion to Augment the Record and File a First Amended Petition, par. 10, filed Oct. 6, 2022.)

Response GO14-149 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures, including Mitigation Measure HAZ-A, are consistent with the requirements of CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. In addition, conditions requiring compliance with regulations are common and reasonable mitigation measures under CEQA. Mitigation Measure HAZ-A does not impermissibly defer mitigation. As discussed in Section 3.7, Geology and Soils, Appendix K, Phase I Environmental Site Assessment, and Appendix L, Hydrology Technical Report, of the Draft EIR, the Draft EIR conducted an extensive preliminary investigation of the proposed Project's sites to determine whether the site exhibited contamination from hazardous materials or would otherwise have impacts to groundwater. Based on this investigation, the Draft EIR concluded that additional investigation may be appropriate, although a full investigation is impracticable at this time because the Project Sponsor does not have access agreements for all the underlying properties and would have to obtain these agreements prior to testing. Moreover, it is appropriate for the Project Sponsor to test soils for contamination at the time the soil is disturbed and properly handle and remove any contaminated soil or groundwater at this time for off-site disposal and/or recycling, as outlined in Mitigation Measure HAZ-A. Mitigation Measure HAZ-A otherwise provides specific performance standards and actions required pursuant to Mitigation Measure HAZ-A, namely that that the preparation of the Soil and groundwater Management Plan would occur prior to any re-grading,

decommissioning, or construction activities and as a condition of the grading, construction, and/or demolition permit(s), and would specify methods for handling and disposal in the event contaminated groundwater or soils are encountered during project construction. Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations. Nevertheless, in response to comments requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Refer to Section 5.0, Corrections and Additions, of the Final EIR. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, discussing how the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Records in this litigation, including the declaration referenced in this comment, speak for themselves.

Comment GO14-150 H. Land Use and Planning Conflicts are Significant and Unavoidable.

In its land use and planning analysis the DEIR states the Project will have a significant environmental effect because it conflicts with the General Plan of the Los Angeles State Historic Park, but that this impact can be made less than significant with the imposition of mitigation measure LUP-A ("Obtain a Los Angeles

State Historic Park General Plan Amendment") to allow "transit uses" within the Park. (DEIR, pp. ES-58, 3.11-38.) But a General Plan amendment to permit this Project within LA State Historic Park is a legal impossibility. The proposed mitigation measure to obtain a General Plan amendment is for an activity that state law expressly prohibits in a California state park historic unit. (See discussion, supra pp. 12-26.) Here, Metro should have determined the proposed mitigation was legally infeasible. When a lead agency makes this determination, a mitigation measure need not be proposed or analyzed. (CEQA Guidelines, § 15126.4, subd. (a)(5).) There is no mitigation to lessen the impact, which is therefore significant and unavoidable.

The significant and unavoidable impact is fatal to the Project's hope to use any portion of LA State Historic Park for a Project component or part of its aerial alignment. But this is not the only significant environmental effect from land use and planning conflicts that the DEIR fails to properly identify and analyze.

Response GO14-150 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO14-151 1. The Project conflicts with the General Plan of El Pueblo de Los Angeles, which the City of Los Angeles must follow.

El Pueblo de Los Angeles Historical Monument "is a national and state registered Historical Monument and City-designated Historic-Cultural Monument located in downtown Los Angeles directly west of LAUS. El Pueblo is historically significant as the birthplace of the City of Los Angeles, established in September 1781 by settlers from present day northern Mexico." (DEIR, p. 2-8.) El Pueblo includes a number of

important historical structures, including "the Avila Adobe, the City's oldest surviving residence; Pico House, built by the last governor of California under Mexican rule, and the City's first grand hotel; the Plaza Firehouse, the City's first firehouse; and Our Lady Queen of Angels Catholic Church, the City's oldest church and the only building at El Pueblo still used for its original purpose." (Id.)

As the DEIR notes, El Pueblo was originally El Pueblo State Historic Park, a historic unit of California's state park system created in 1953. (DEIR, p. 3.5-7.) It was transferred to the City of Los Angeles, and in 1992 a new City Department, El Pueblo de Los Angeles Historical Monument Authority Department ("El Pueblo Department"), was created to operate, manage, maintain, and control El Pueblo. (LA Admin. Code ("LAAC"), Ch. 25, art. 1, § 22.620.) The Department is overseen by the El Pueblo de Los Angeles Historical Monument Authority Commission (the "Board"). (LAAC, § 22.621.) The Board has the "power and authority to approve street lights, street and sidewalk surfaces, fixtures and other appliances and furnishings proposed to be located in or on the sidewalks, streets and ways immediately adjoining the Monument in order to maintain and enhance the ambiance and character of the Monument." (LAAC, § 22.626.) The Board may "enter into contracts for services and leases as it deems necessary for the operation, management, maintenance and control of the Monument" within certain express limitations, but neither the Board nor Department have any power to "to acquire or sell any real property for or on behalf of itself or of the City." (LAAC, §§ 22.627, 22.632.) The Board may not approve "master plans, development plans, and amendments thereto" without prior approval of the Los Angeles City Council and Mayor. (LAAC, § 22.634.)

Response GO14-151 This comment provides a recitation and characterization of text from the Draft EIR, but does not raise a substantive issue on the content of the Draft EIR. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response GO14-153 for a discussion of how the proposed Project would be consistent with the El Pueblo General Plan.

Comment GO14-152 The DEIR also notes the existence of El Pueblo's General Plan and the El Pueblo Department's El Pueblo de Los Angeles Strategic Plan, which "has as one of its objectives 'historic and asset management'" with a goal to "continue to implement and adhere to El Pueblo's General Plan by restoring and renovating properties to their highest and best use." (DEIR, p. 3.5-8.)

The DEIR fails to mention, however, that the City's acquisition of El Pueblo from the State of California came with specific deed restrictions that limit the City's actions with respect to permissible uses of El Pueblo land it acquired and holds in public trust for the people of the City and California.[70] The Quitclaim Deed restrictions require El Pueblo's development and operation to conform to its April 11, 1980, General Plan. While the City may amend the El Pueblo general plan, in doing so the

City "shall consider the development criteria of Section 5019.59 of the Public Resources Code." (Quitclaim Deed, condition subsequent no. 1, pp. 1-2.) This statute explicitly limits what can be constructed in a state historic park: "The only facilities that may be provided [in a state park historic unit] are those required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking." (Pub. Res. Code, § 5019.59 (emphasis added).) Failure to follow the Quitclaim Deed's express restrictions allows a right of reversion to the State. (Quitclaim Deed, p. 2.) The DEIR fails even to mention these strict land use limitations.

Footnote 70: Quitclaim Deed between State of California and City of Los Angeles for El Pueblo de Los Angeles Historic Monument ("Quitclaim Deed"), executed Oct. 27. 1988, attached as Exhibit T.

Response GO14-152 As noted in in Section 3.05, Cultural Resources, of the Draft EIR, the City of Los Angeles signed an agreement in 1953 with the County of Los Angeles and State of California creating El Pueblo State Historic Park (El Pueblo). This agreement allowed the State to purchase most of the property comprising El Pueblo. In cooperation with the City and County, in 1980, the State prepared the El Pueblo General Plan to provide guidelines for the preservation, rehabilitation, and interpretation of the historic buildings as well as for new development within the Park. In 1992, the property within the Park was transferred to the City; in 1994, a separate department was created, and the name was changed to El Pueblo de Los Angeles Historical Monument. Page 3.5-6, in Section 3.05, Cultural Resources, of the Draft EIR, expressly discusses Public Resources Code section 5019.59. Section 3.11, Land Use and Planning, of the Draft EIR, also discusses Public Resources Code section 5019.59 on pages 3.11-1 to 3.11-2, recognizing that the "only facilities that may be provided are those required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking." As discussed further on pages 3.11-38, 3.11-39, and 3.11-42, Public Resources Code section 5019.59 permits facilities for the comfort and enjoyment of the visitors, such as access. As an initial matter, no portion of the proposed Project would touch down on any of the parcels described in the Quitclaim Deed, referenced as Exhibit T to this comment.[21] As discussed in Section 3.11, the vertical circulation elements west of the Alameda Station would be introduced within the ROW north of the Placita de Dolores, on the west side of Alameda Street, in a proposed new pedestrian plaza in an area currently containing a parking and loading area for El Pueblo. This area was designated as City ROW prior to the execution of the Quitclaim Deed in 1990, and is not described within Exhibit A to the Quitclaim Deed, containing the legal descriptions of parcels subject to the deed. Accordingly, the provisions of the Quitclaim Deed may not apply to the proposed Project. Nevertheless, consistent with Public Resources Code section 5019.59, the proposed

[21] State of California and City of Los Angeles. 1988. Quitclaim Deed for El Pueblo de Los Angeles Historic Monument.

Project would provide for access to El Pueblo and the Los Angeles State Historic Park, and accordingly is an allowable use under Public Resources Code section 5019.59. Moreover, as noted in the comment above, the City is only required to "consider" the development criteria of Section 5019.59 under the referenced Quitclaim Deed, and is not bound to abide by its requirements. Refer to Topical Response F, Los Angeles State Historic Park, for further discussion of Public Resources Code section 5019.59 and considerations for approval of projects within the State parks system.

As discussed in detail in Response GO14-153, the proposed Project would be consistent with the El Pueblo General Plan. The proposed Project would provide connections to and from open spaces within El Pueblo, including Los Angeles Plaza Park, via Alameda Station. The proposed Alameda Station would include new pedestrian plaza at El Pueblo north of the Placita de Dolores in an area currently used as a parking and loading area for El Pueblo and installation of landscaping and hardscape. In addition, the proposed Project would connect the El Pueblo area with other open spaces uses along the Project alignment, including the Los Angeles State Historic Park and Elysian Park.

Comment GO14-153 The DEIR describes use of El Pueblo land necessary to construct Alameda Station:

Vertical circulation elements (i.e. elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas to the station, would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as a parking and loading area for El Pueblo.

(DEIR, p. 2-23.)

These "vertical circulation elements" would be located on land within El Pueblo's boundary that is subject to its General Plan. Since the City must follow the mandate of Public Resources Code Section 5019.59, which restricts permissible facilities at El Pueblo to only those "required for the safety, comfort, and enjoyment of the visitors" it may not construct any portion of the Project within the El Pueblo de Los Angeles Historical Monument boundary. The DEIR's failure even to provide basic background information regarding this significant environmental impact due to a clear conflict with the El Pueblo General Plan, let alone any proposed mitigation measure to lessen its significance requires the DEIR to be revised and recirculated.[71, 72]

Footnote 71: This assumes a mitigation is possible. As with the Project's similar conflict with LA State Historic Park's General Plan, the impact appears to be significant and unavoidable. (See discussion, supra p. 25.)

Footnote 72: For the record, LA Parks Alliance notes a discrepancy between an illustration of El Pueblo found in the 2016-2020 Strategic Plan and the actual El

Pueblo park boundary as the park was accepted by the City from the State of California. Page four of the Strategic Plan appears to show a small triangular cutout of El Pueblo's boundary along Alameda Street, adjacent to the Old Winery, Avila Adobe, and Placita de Dolores locations at the Historic Monument. The true park boundary as indicated on the 1980 General Plan applicable to the property and as accepted by the City has no such triangular cutout. See Quitclaim Deed, Exhibit "B" Sheet 1, pdf. p. 13; see also El Pueblo General Plan, pdf p. 6 (El Pueblo de Los Angeles State Historic Park, Drawing No. 17269, "Project Description & Vicinity"). The El Pueblo boundary along Alameda adjacent to the Project is a continuous straight line with no triangular cut out. Even if the City could provide this surplus land to the Project, SMMC has a right of first refusal under Public Resources Code section 33207(b).) (See discussion, supra pp. 6-8.)

Response GO14-153 Refer to Response GO14-152 for a discussion of the Quitclaim Deed and its applicability to the parcel where the proposed Project's Alameda Station vertical circulation elements would be located. As discussed in GO14-152, the legal descriptions for parcels governed by the Quitclaim Deed are contained in Exhibit A. The sheets provided in Exhibit B, referenced in Footnote 72, are provided for illustrative purposes and should not control over the legal descriptions provided in Exhibit A. As noted in Section 3.05, Cultural Resources, of the Draft EIR, the City of Los Angeles signed an agreement in 1953 with the County of Los Angeles and State of California creating El Pueblo State Historic Park. In cooperation with the City and County, in 1980, the State prepared the El Pueblo General Plan to provide guidelines for the preservation, rehabilitation, and interpretation of the historic buildings as well as for new development within the Park. While the proposed Project is located within the boundaries of the El Pueblo de Los Angeles General Plan, as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the vertical circulation elements west of the Alameda Station would be introduced within the ROW north of the Placita de Dolores, on the west side of Alameda Street, in a proposed new pedestrian plaza in an area currently containing a parking and loading area for El Pueblo. Although the portions of the proposed Project within the El Pueblo General Plan area would be located entirely within the public ROW, the proposed Project would still be consistent with the El Pueblo General Plan. Refer to Section 3.05 for further discussion of the El Pueblo General Plan, including policies related to the Placita de Dolores and integration with LAUS. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of the proposed Project's consistency with the applicable El Pueblo de Los Angeles General Plan goals and objectives. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park

Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. Accordingly, no mitigation is required for the proposed Project in relation to the El Pueblo de Los Angeles General Plan, as CEQA Guidelines section 15126.4 only requires mitigation for significant impacts.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of the Surplus Land Act.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO14-154 2. The Project conflicts and is inconsistent with numerous land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects.

The DEIR asserts the proposed Project is subject to numerous land use plans, policies, and regulations, including, but not limited to (DEIR, pp. 3.11-37 to 3.11-38):

- Los Angeles State Historic Park General Plan
- Dodger Stadium Conditional Use Permit
- City of Los Angeles General Plan, including several community plans
- City of Los Angeles RIO District Ordinance
- Cornfield Arroyo Seco Specific Plan

The DEIR performs a conclusory analysis of the above and other land use plans, policies, and regulations (see Tables 3.11-1 through 3.11-6, DEIR, pp. 3.11-39 to 3.11-73) and concludes that the only land use conflict requiring mitigation is the Project's acknowledged conflict with the LA State Historic Park General Plan. (DEIR, p. 3.11-77.) As discussed above, the Project conflict with LA State Historic Park is significant and unavoidable, and the proposed mitigation to paper over the conflict is legally infeasible. (See discussion, supra pp. 12-26.) Likewise, the proposed mitigation for the Project's equally clear conflict with the El Pueblo General Plan is also legally infeasible. (See discussion, supra pp. 73-75.)

Response GO14-154 Refer to Section 3.11, Land Use and Planning, of the Draft EIR for a discussion of the proposed Project's consistency with various land use plans, policies, and documents, including the Los Angeles State Historic Park General Plan, the 1960 Dodger Stadium CUP, the City of Los Angeles General Plan, the City of Los Angeles'

River Implementation Overlay District Ordinance, and the Cornfield Arroyo Seco Specific Plan. Section 3.11 provides approximately 40 pages of analysis of the proposed Project's consistency with the various land use plans, policies, and documents affecting the land along the proposed Project's alignment. The EIR is intended to provide environmental review for the proposed Project outlined in Section 2.10, Required Permits and Approvals, of the Draft EIR, inclusive of the City of Los Angeles' approval of a Specific Plan. Refer to Section 3.11, for a discussion of the proposed Project's consistency with various land use planning documents, including the City of Los Angeles General Plan, City of Los Angeles Zoning Code, River Implementation Overlay District, and Cornfield Arroyo Specific Plan. As discussed in Section 3.11, the Project Sponsor is seeking to create a Specific Plan as part of the proposed Project to allow for the proposed Project to be fully consistent with the surrounding zoning and to otherwise provide for the consistent application of Project design standards, limitations and operational measures, as well as relief from the Cornfield Arroyo Specific Plan and River Implementation Overlay District. Accordingly, with these approvals, the proposed Project would not conflict with the applicable land use documents at the time of Project implementation, and the impact would be less than significant. CEQA Guidelines section 15126.4 only requires mitigation for significant impacts. Refer to Response GO14-154 for discussion regarding the LASHP General Plan Amendment and associated mitigation measure. As the agency having land use authority over the park will be the Responsible Agency implementing the General Plan Amendment, there is substantial evidence that any potential inconsistencies with the General Plan will be addressed through that General Plan Amendment process. Refer to Topical Response F, Los Angeles State Historic Park for a discussion of the LASHP General Plan Amendment. Refer to Responses GO14-152 and GO14-153 for a discussion of the proposed Project's consistency with the El Pueblo General Plan.

Comment GO14-155 Without more it is evident that the Project has significant and unavoidable environmental impacts within the land use and planning analysis category. Nonetheless, this letter will briefly touch on some of the more obvious conflicts between the Project and other plans, policies, and regulations discussed in the DEIR.

Response GO14-155 This comment provides a general introduction to the comments raised in this section of this letter related to significant and unavoidable environmental impacts within the land use and planning analysis category. As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents. Additionally, as determined in Section 3.11 impacts related to Land Use and Planning from the proposed Project would be less than significant.

Comment GO14-156

GO14-156A LA Park's Alliance notes that the land use consistency analysis includes many speculative and unsupported claims already mentioned above. For example, and as discussed above, the DEIR repeatedly describes the speculative use of Dodger Stadium Station as an access point for communities adjacent to Dodger Stadium as a Project feature even though that permissive use would require future consideration and is not guaranteed to occur or remain available, the DEIR's ridership study is entirely speculative and not based on actual data, and the Project itself is not guaranteed to operate every day (as discussed, it will run according to demand, perhaps not at all) and provides priority to Dodger Stadium event ticket holders.

GO14-156B The DEIR also repeats that the travel time from Union Station to Dodger Stadium with the Project is only seven minutes, neglecting to provide any estimate of the total time including queueing/waiting, which is the far more relevant consideration. Any consistency analysis relying on these speculative, unsupported, and incomplete claims is necessarily misleading and inadequate.

Response GO14-156

GO14-156A Refer to Responses GO14-150 through GO14-155 for a discussion of the proposed Project's consistency with various land use plans. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Response GO14-

143 for discussion of the proposed Project's ridership model and the proposed Project's operations. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

GO14-156B As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. Nevertheless, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, which is provided for informational purposes, and pre-game and post-game transportation. Refer to Responses GO14-97 and GO14-98 for additional discussion of the proposed Project's ridership model.

Comment GO14-157 In addition, because the Project fails to consider the foreseeable development of parking lot areas around Dodger Stadium, any consistency analysis with respect to public services within the City of Los Angeles General Plan (especially its Framework and Land Use Elements) is incomplete and inadequate. These would include plans, goals, policies, and objectives related to police and fire service, parks, libraries, schools, and the like.

Response GO14-157 Refer to Responses GO14-150 through GO14-155 for a discussion of the proposed Project's consistency with various land use plans. Refer to Responses GO14-56 through GO14-69 for a discussion of how the how the proposed Project solely proposes an aerial gondola system and other uses of the Dodger Stadium property are not reasonably foreseeable requiring analysis in the Draft EIR. Refer to Section 3.15, Public Services, of the Draft EIR for a discussion of how the proposed Project would result in less than significant operational impacts with respect to public services.

Comment GO14-158 Los Angeles State Historic Park General Plan

The DEIR asserts that the "The proposed Project would provide recreation opportunities in coordination with the regional recreation network by providing a connection from the Los Angeles State Historic Park to other local transit lines along the Project alignment and the regional transit system accessible at LAUS…" (DEIR, p. 3.11-39.) The Project is not itself a recreational facility, it is a private transit facility, primarily intended to move people from LA Union Station to Dodger Stadium. Though if the Project were built users could theoretically take it to LA State Historic Park, there is no substantial evidence that people will do so, because a robust public transit system already serves the Park. Ridership studies for the

Project are speculative, as are Project features to allegedly transport persons to the Park, to Elysian Park, and elsewhere other than on game days, when Dodger Stadium ticket holders will have priority.

The DEIR asserts: "The proposed Project would not interfere with the passive uses currently enjoyed at the Los Angeles State Historic Park. The proposed Project's aerial clearance would allow the continued use of the park, with certain limitations." (Ibid.) The second sentence negates the first. If limitations are placed on the Park's use, the Project necessarily interferes with the Park. In fact, the Project would take well over an acre of the Park for private use, not including the remainder parcel created by the Project alignment's intrusion at the western side of the Park. Park activities in the area of the gondola will be changed, including for major events, when event stages will be forced to find a new location in the Park (causing foreseeable significant indirect physical changes that have not been analyzed in the DEIR).

Response GO14-158 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed in Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. The majority of the area to the west of the proposed Project's alignment in Los Angeles State Historic Park is an access road whose use will not be impacted by the proposed Project. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment GO14-159 The DEIR's assertions regarding consistency with the Park's aesthetic goals are adequately addressed elsewhere in this letter. The Project clearly does not "[p]rotect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing adverse impacts to aesthetic resources." (DEIR, p. 3.11-39.) It does exactly the opposite, harming vital aesthetic, cultural, and historic resources that are protected by the Park's General Plan and Final EIR document.

Response GO14-159 This comment provides a general summary of the comments raised in this letter related to aesthetic, cultural, and historical resources. Responses to these comments contained in this letter are provided above in Responses GO14-83, GO14-105, and GO14-109 through GO14-147.

Comment GO14-160 The DEIR asserts that the Project's proposed park amenities would be a visitor benefit. (DEIR, p. 3.11-41.) The Park already has adequate concessions and other park amenities and the proposed amenities are not necessary, and would largely serve to replace existing facilities the Project would destroy. Thus, the DEIR's assertions regarding Park Facilities Goals are specious – but for the Park's destruction of existing facilities, development of replacement facilities would not be necessary. Project facilities are not Park facilities, they would merely be located within the Park. Under Public Resources Code section 5019.59, however, they are not permitted. Similarly, the Project is not consistent with the Park's Education and Interpretation Goal since the Park's goals do not relate to interpretation of non-Park structures and facilities. That the massive Chinatown/State Park Station might include an exhibit, display, public art, or interpretive display does not diminish the negative impact of its unlawful intrusion.

Response GO14-160 The proposed Project does not propose to demolish nor does it need to demolish the Cargo Snack Shack concession or restrooms. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. Through continued collaboration with State Parks which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from the park's purpose and objectives. For example, in addition to the concessions, restrooms, and breezeway, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/ State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including

the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. In addition, the station canopy would provide much needed shade. As discussed in Topical Response F, Los Angeles State Historic Park, the Project Sponsor would work with State Parks through the General Plan Amendment process to develop an "Interpretation Plan" to identify unique ways to use the proposed Project to provide interpretation for the park and its history. The Interpretation Plan would help ensure that the proposed Project is a benefit to Los Angeles State Historic Park by providing visitors with, consistent with the park's existing General Plan, an engaging and informative experience that deepens their understanding and appreciation of Los Angeles State Historic Park's culture and history as a former and current (should the Project be developed) transportation hub. Refer to Topical Response F, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the Project's use of Los Angeles State Historic Park.

Comment GO14-161 As already discussed, the Project does not assist the Park in meeting its Access and Circulation Goal. The Park's existing access is sufficient to welcome pedestrians, cyclists, and a small number of vehicles. Public transit access is readily available through Metro's nearby Gold Line station and on public bus lines. The Project would not "create a sense of entry and arrival at the Park" (DEIR, p. 3.11-42), it would completely obscure the Park's existing entry. (See discussion and images, supra p. 60.) Further, additional access is not required, and the DEIR provides no substantial evidence to support that a significant number of people would use the Project for the purpose of traveling to the Park. Per the DEIR's own study, at most 10% of visitors to special events might use the gondola to arrive, meaning 90% of visitors will not experience the "sense of entry" the Project would impose in achieving its true objective.

Response GO14-161 Refer to Response GO14-160 for a discussion of how the proposed Project will be integrated into the park and also the proposed Project's benefits to park access. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment GO14-162 Dodger Stadium Conditional Use Permit

The DEIR asserts that the Project is consistent with the Dodger Stadium Conditional Use Permit. (DEIR, 3.11-43.) But the DEIR provides analysis of exactly two of the CUP conditions (conditions 1 and 3). (Ibid.) Elsewhere, the DEIR describes that a Plan Approval for the Conditional Use Permit is necessary, while adding that

condition 4 of the CUP provides for "collaboration 'in devising mass transportation service to the Stadium site…'" (DEIR, 2-62.) The consistency analysis describes no conflict with the CUP. But there logically must be a conflict, or at least a potential conflict, or no Plan Approval would be necessary. The DEIR's consistency analysis is therefore incomplete and inadequate for failing to provide the necessary information to determine whether the Project is or is not consistent with the CUP.

Response GO14-162 Refer to Section 2.10, Required Permits and Approvals, and Section 3.11, Land Use, of the Draft EIR, noting that, pursuant to Los Angeles Municipal Code ("LAMC") section 12.24.M, the Project Sponsor may seek a Plan Approval for the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to implement the proposed Project. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events." Refer to pages 3.11-17 through 3.11-18, of Section 3.11, Land Use, of the Draft EIR, for a discussion of the CUP's requirements. An analysis of the proposed Project's consistency with the CUP and the CUP's requirements is provided on page 3.11-43, identifying the pertinent requirements of the CUP. Section 3.11 also recognizes that the Plan Approval could allow for an exception from the Stadium Tower and Dodger Stadium Station site's height district designation, as the Stadium Tower and Dodger Stadium Station would exceed these limits. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO14-163 City of Los Angeles – Framework Element

The consistency analysis with the City of Los Angeles Framework Element is notable more for what it leaves out of the analysis than what it includes. The DEIR asserts that the Project is consistent with Objective 6.2 of chapter of the Framework Element. (DEIR, p. 3.11-49.) While the Project theoretically would add an additional private transit option to transport persons from Union Station to LA State Historic Park (when it is running and not prioritizing Dodger Stadium event patrons), the DEIR provides little evidence a significant number of persons will use it instead of the existing and readily available Metro Gold Line, bus lines, or other options such as walking or riding a bicycle. The proposed Project's consistency with Objective 6.2 is therefore speculative. Consistency with the Framework Element's Transportation policy is similarly deficient.

Response GO14-163 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how the underlying factors that would influence pre-game/event and post-game/event travel conditions and

ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data.

As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the City of Los Angeles Framework Element. As discussed in Section 3.11, the proposed Project would expand mobility and accessibility for transit riders in the region by providing high-capacity aerial rapid transit connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities. Implementation of the proposed Project would create new and improve existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, and several regional and local bus lines serving the Project Study Area. As stated in Section 3.11, potential impacts related to Land Use and Planning from the proposed Project would be less than significant.

Comment GO14-164 The Framework Element consistency analysis omits Objective 3.17: "Maintain significant historic and architectural districts while allowing for the development of economically viable uses." (Framework Element, Chapter 3.)[73]

The Framework Element consistency analysis omits discussion of Goal 6A and Objective 6.1, which are particularly relevant to the numerous parks adversely impacted by the Project, particularly LA State Historic Park.

> Framework Element Goal 6A: "An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses."
>
> Framework Element Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region. (Framework Element, Chapter 6.)

The DEIR's reliance on speculative and unsupported claims and omission of highly relevant goals and objectives causes the Framework Element consistency analysis to be invalid.

Footnote 73: The City of Los Angeles Framework Element is currently available at: https://planning.lacity.org/planspolicies/framework-element (last viewed Jan. 14, 2023).

Response GO14-164 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource

Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.05, Cultural Resources, of the Draft EIR, for discussion of City of Los Angeles General Plan objectives and policies related to the protection of archaeological, paleontological, cultural, and historic resources. As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents, including the City of Los Angeles Framework Element. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

In addition, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. Due to its densely developed and urbanized nature, the Project area provides little opportunity for wildlife species or other biological and other natural resources to exist. No natural habitats occur in the Biological Survey Area (BSA), and there are no Habitat Conservation Plans or Natural Community Conservation Plans that overlap with the (BSA). Due to the location of the proposed Project alignment, which crosses over a small portion of the park, the proposed Project does not significantly impact recreational area within the Los Angeles State Historic Park.

Further, as discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project

would have less than significant operational impacts, including to Los Angeles State Historic Park. Therefore, the proposed Project would be consistent with these Objectives, as the proposed Project is not a threat to encroachment upon open space, but provides an additional transit option between the region's transportation hub at LAUS and the Los Angeles State Historic Park and Elysian Park, consistent with the goal to provide an accessible and integrated open space system. The proposed Project's limited footprint in the Los Angeles State Historic Park still allows for the use of the vast majority of the Park. Further, as noted above, the proposed Project would have less than significant operational impacts with respect to Biological Resources and Parks and Recreational Facilities, and therefore would not encroach upon the City's natural resources.

Nevertheless, under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. Further, under the Planning and Zoning Law (Government Code §§ 65000-66499.58), strict conformity with all aspects of a general plan is not required. A proposed project should be considered consistent with the local general plan if it furthers one or more policies and does not obstruct other policies. As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project would be consistent with the City of Los Angeles General Plan's applicable goals and policies, and would not otherwise obstruct the obtainment of other goals and policies.

Comment GO14-165 Central City Community Plan

Within the Project area, the Central City Community Plan touches only El Pueblo de Los Angeles Historical Monument, so it is only nominally relevant to the Project, and is largely superseded by land use regulations of the El Pueblo General Plan, with which the Project is clearly inconsistent. (See discussion, supra pp. 73-75.) As discussed above, the consistency analysis relies on speculative and unsupported claims regarding Project availability to community members and Project ridership and is therefore invalid. With respect to connections to LA State Historic Park, the Project allegedly provides a transit connection that is duplicative of existing robust public transit options, walking, and cycling.

Response GO14-165 Refer to pages 3.11-47 through 3.11-56 of Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with applicable City General Plan polices, including with the Central City Community Plan policies and guidelines. As discussed on page 3.11-7, the portion of the Alameda Station located over the west side of Alameda Street and the suspended above-grade cables and cabins from Alameda Station north to Cesar E. Chavez Avenue is within the boundaries of the Central City Community Plan. Refer to Responses GO14-152 and GO14-153 for a discussion of the proposed Project's consistency with the El

Pueblo de Los Angeles General Plan. Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As discussed in Section 3.11, the proposed Project would expand mobility and accessibility for transit riders in the region by providing high-capacity aerial rapid transit connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities. Implementation of the proposed Project would create new and improve existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, and several regional and local bus lines serving the Project Study Area. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment GO14-166 As in the Framework Element, the Central City Community Plan Element leaves out important objectives and policies. The analysis is incomplete without considering Objective 9.2: "To provide the requisite services, housing opportunities, and community environments to allow the homeless to rejoin the workforce and lead more productive lives." The Project seeks to utilize City surplus land that would be better used for development of affordable housing and job creation and is known to conflict with longstanding community development plans in the area of the Project's Alameda and Alpine Towers. The Project is not only inconsistent with but blocks the attainment of Objective 9.2.

The Central City Community Plan also includes Objective 11-7: "To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access." Objective 11-8: "To evaluate, study and monitor current parking policies to assess parking demand as a result of changes in development trends, the growing downtown residential community and the general intensification of land use in the Central City area as surface parking lots become developed with other uses." As discussed elsewhere, the claimed benefit of high rate of public transit use for the Project and removal of vehicles from Project area roadways is speculative and highly inflated.[74] Legitimate fears of gondola users driving downtown and inundating the neighborhoods around Union Station and the LA State Historic Park have been a concern of community members since the Project was first made public. The DEIR's failure to address these legitimate concerns, which are consistent with issues identified in the Central City Community Plan by providing even a cursory analysis of the Project's consistency with Objectives 11-7 and 11-8 is puzzling.

Footnote 74: See UCLA Mobility Study, supra p. 48 fn. 47 (Exhibit P).

Response GO14-166 Refer to pages 3.11-47 through 3.11-56 of Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with applicable City General Plan polices, including with the Central City Community Plan policies and guidelines. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[22] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, attached to this letter as Exhibit P. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
Jiaqi Ma
Director, UCLA Mobility Lab
Faculty Associate Director, UCLA Institute of Transportation Studies

[22] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. No analysis is required if the proposed project is consistent with the plan. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. As discussed in Section 3.11, the proposed Project would be consistent with the Central City Community Plan's applicable goals and policies, and would not otherwise obstruct the obtainment of other goals and policies.

Nevertheless, while Central City Community Plan Objective 9.2 is inapplicable to the proposed Project as an aerial rapid transit project, it would not obstruct the obtainment of this objective to provide homeless services and housing opportunities. As discussed in Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, the Alpine Tower's location considered and avoided the anticipated 903 North Main Street Homeboy housing project and the proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces. Rather, implementation of the proposed Project would provide additional access and mobility by providing a transit option to/from LAUS and Chinatown and other employment areas in downtown Los Angeles that would avoid congested local roadways and provide a transit option to Dodger Stadium on game days and for special events that would bypass typical vehicle traffic. Therefore, the proposed Project would not displace housing, but would provide a benefit to existing residents in the area.

Regarding Central City Community Plan Objectives 11-7 and 11-8, refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles, thereby encouraging alternative modes of access. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As

recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. The proposed Project is therefore consistent with Central City Community Plan Objectives 11-7 and 11-8.

Comment GO14-167 Central City North Community Plan

The Central City North Community Plan consistency analysis relies on the same speculative and unsupported claims regarding Project availability to community members and Project ridership as the Central City Community Plan and is likewise invalid. The Project's transit connection with LA State Historic Park is duplicative of existing options and there is no substantial evidence of a need for the service for that purpose.

The discussion of Goal 12 ("Encourage alternative modes of transportation to the use of single vehicle occupant trips…") is curious, since the primary purpose of the Project is transporting Dodger Stadium game and event patrons, and the average number of persons per vehicle to Dodger Stadium is 3.6.[75] The primary purpose of the Project would thus not reduce single vehicle occupant trips. (This point is equally applicable to Silver Lake-Echo Park-Elysian Valley Community Plan Goal 11, which is identical to Central City North's Goal 12.)

Footnote 75: See UCLA Mobility Study (Exhibit P), p. 3; accord, Dodger Stadium Conditional Use Permit (DEIR, p. 3.11-43).

Response GO14-167 As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the City of Los Angeles Central City North Community Plan. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/ State Park Station would

be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project would expand mobility and accessibility for transit riders in the region by providing high-capacity aerial rapid transit connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities. Implementation of the proposed Project would create new and improve existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, and several regional and local bus lines serving the Project Study Area. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this Chinatown/State Park Station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, attached to this letter as Exhibit P. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Comment GO14-168 Relevant Objectives and supporting policies omitted from the Central City North Community Plan consistency analysis include Objective 1-4: "To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background." As in the consistency analysis of the Central City Community Plan with its Objective 9-2, the Project is not consistent with this objective since it seeks to take City surplus land in the Community Plan area very well suited to the development of affordable housing and conveniently located near existing public transit options. The Project is also not consistent with Goal 4 and Objective 4-1, which calls for the conservation of existing recreation and park facilities. The Project would reduce available park space at LA State Historic Park by well over an acre before considering the loss of the remainder parcel to the west of the proposed Project alignment. Similarly, the Project is not consistent with Goal 5 and Objective 5-1, "[t]o preserve existing open space resources…" (Emphasis added.)

Response GO14-168 Refer to Section 3.14, Population and Housing, of the Draft EIR for a discussion of applicable policies related to housing, including from the Central City North Community Plan. As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the City of Los Angeles Central City North Community Plan. Refer to Topical Response E, The Proposed Project Will

Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. In addition, refer to Topical Response E for a discussion of the Surplus Land Act. Accordingly, the proposed Project would not prohibit the obtainment of Objective 1-4, and therefore is consistent with this Objective. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Therefore, the proposed Project would be consistent with Goals 4 and 5, and Objectives 4-1 and 5-1. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. No analysis is required if the proposed project is consistent with the plan. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. As discussed in Section 3.11, the proposed Project would be consistent with the Central City North Community Plan's applicable goals and policies, and would not otherwise obstruct the obtainment of other goals and policies.

Comment GO14-169 Finally, there can be no doubt that a consistency analysis with the Central City North Community Plan cannot be considered complete without a serious discussion of Goal 17 and its supporting Objective 17-1: "To ensure that the Community's historically significant resources are protected, preserved, and/or enhanced."

Response GO14-169 As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the Central City North Community Plan. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, Goal 17 of the Central City North Community Plan states "Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance."

Objective 17-1 states, “To ensure that the Community’s historically significant resources are protected, preserved, and/or enhanced.”

The Draft EIR fully analyzed and addressed the proposed Project’s potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR’s analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans,” and does not require a discussion where the proposed project would be consistent with such plans. No analysis is required if the proposed project is consistent with the plan. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. As discussed in Section 3.11, the proposed Project would be consistent with the Central City North Community Plan’s applicable goals and policies, and would not otherwise obstruct the obtainment of other goals and policies, including policies related to the preservation of cultural resources, as the proposed Project’s potential impacts to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation

Comment GO14-170 “RIO” River Improvement Overlay District

While LA Parks Alliance does not believe the Project is consistent with the RIO District, and the consistency analysis relies largely on speculative, unsupported, and incomplete information, the primary conflict with RIO that is not adequately discussed in the DEIR is with respect to the potential for light intrusion, particularly from potential electronic digital displays that are described as possible for gondola cabins. The consistency analysis should therefore be revised and recirculated for additional public review and comment.

Response GO14-170 As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the River Improvement Overlay District (RIO District). Specifically, the proposed Project’s consistency with the RIO District and its applicable goals and objectives is discussed on pages 3.11-68 through 3.11-73 in Section 3.11 of the Draft EIR. Project lighting would include low-level lighting for security and wayfinding purposes. Exterior lighting adjacent to stations and towers would be shielded or directed toward the areas to be lit to limit spillover onto

adjacent properties and off-site uses and would meet all applicable LAMC lighting standards. With respect to the existing RIO District guidance, and as discussed in Section 3.01, Aesthetics, the lighting of the proposed Project would exceed RIO requirements in certain locations along the alignment. However, these locations are in urban areas with existing lighting that exceeds RIO requirements, as they require higher illuminance for safety and security. Further, the proposed Project sites within the RIO are located more than 2,600 feet from the Los Angeles River, and therefore have no direct influence on the lighting within or adjacent to the Los Angeles River. In addition, the proposed Project includes a proposed Specific Plan to establish the land use regulations for the Project, including lighting standards, to ensure consistent implementation of development standards throughout the Project sites in recognition of the Project's unique characteristics, including unique opportunities for public benefits and unique constraints posed by the Project site's location which are not experienced by other sites. The RIO does not impose any limits on the size, use, height and/or setbacks of a building beyond what is restricted by the prevailing zoning and building codes. The proposed Project would not change the current uses of RIO District parcels on which the project is constructed or adjacent to. Table 3.11-6, Project Consistency with Applicable RIO District Objectives, in Section 3.11, Land Use and Planning, of the Draft EIR demonstrates how the proposed Project would be consistent with applicable objectives for the RIO District. As such, the proposed Project would not conflict with the implementation of the design guidelines under the RIO on adjacent properties. Therefore, impacts related to consistency with the RIO would be less than significant.

Comment GO14-171 Cornfield Arroyo Seco Specific Plan

The Project seeks an exception from the Cornfield Arroyo Seco Specific Plan ("CASP") and to create a Specific Plan to benefit the project and relieve it from otherwise applicable City of Los Angeles zoning regulations and to allow construction of the Chinatown/State Park Station. (DEIR, p. 3.11-63.) Though the DEIR asserts that "the provision of a station at this location would be consistent with the overall intent of the CASP…" (ibid.) that is a legal impossibility. If the Project were consistent with the CASP it would not need an exception to the CASP. (In the City of Los Angeles, a specific plan "exception" is essentially equivalent to a variance.)

Response GO14-171 As identified in Section 3.11, Land Use and Planning, of the Draft EIR, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the Cornfield Arroyo Seco Specific Plan (CASP). The Chinatown/State Park Station and portion of the suspended above-grade cables and cabins from West College Street to the northern boundary of the Los Angeles State Historic Park would be located within the boundaries of the CASP, which designates the park as Open Space. Although the northern portion of the

Chinatown/State Park Station would be integrated into existing State-owned park land, and, thus, is not subject to local requirements, permits, or approvals for development on this property, the Chinatown/State Park Station would still be consistent with the CASP, which allows for mobility hub amenity and transit hub amenity uses on land designated for Open Space. Additionally, the provision of a station at this location would be consistent with the overall intent of the CASP as a point of local and regional connectivity by alternative means of transportation including increased transit, pedestrian, and bicycle use, reducing vehicle trips through and within the area, all while providing an area of increasingly accessible open space. The Chinatown/State Park Station and portion of the suspended above-grade cables and cabins within the CASP would provide a new transit stop to bring residents and visitors to the existing open space and recreational opportunities within the park, keeping consistent with the plan's objectives. The Chinatown/State Park Station would include a mobility hub, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, consistent with the CASP's zoning regulations.

As noted in Section 3.11, Land Use and Planning, of the Draft EIR, pursuant to Los Angeles Municipal Code (LAMC) section 11.5.7.F, the Project Sponsor is seeking an exception from the CASP to allow for the Chinatown/State Park Station. Approval of the amendment to LAMC would allow for the proposed Project to be fully consistent with the surrounding zoning, as the proposed Project is already generally consistent with the surrounding area, which includes Metro's L Line (Gold). With approval of the amendments to the zoning code, development of the Chinatown/ State Park Station would not conflict with the applicable LAMC requirements at the time of Project implementation, and the impact would be less than significant.

As the lead agency, Metro is required to assume that the proposed Project would be approved, constructed, and operational in drafting the EIR. Refer to Section 2.0, Project Description, of the Draft EIR, for a list of the land use approvals that may be required for implementation of the proposed Project, including a potential exception from the CASP. These approvals are included in the proposed Project Description, and therefore Metro properly analyzed the proposed Project's environmental impacts as if the proposed Project would be approved by all applicable agencies, inclusive of these approvals.

Comment GO14-172 I. The Failure to Mitigate Temporary Loss of Access to Substantial Portions of LA State Historic Park is Impermissible.

The DEIR notes that "[c]onstruction of the Chinatown/State Park Station would require the temporary closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during the approximately 19 months for the construction of the Chinatown/State Park Station." (DEIR, p. 3.16-16.) The DEIR finds the closure is not significant, justifying its conclusion by comparing loss of this land to park patrons for more than a year and a half to the Park's occasional closure

for special events. The comparison is inapt. The DEIR's conclusion does not evince that the determination was made using "careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data." (CEQA Guidelines, § 15064, subd. (b)(1).)

Though not offered in mitigation, since the DEIR has determined the loss is not significant, Metro essentially suggests park visitors can just suck it up—go someplace else, use some other part of the Park, or perhaps just skip going to local parks until the Project is complete. This is unacceptable, especially in light of the identified significant and unavoidable noise impacts to the Park, for which no mitigation has been identified.

The DEIR is inadequate for failing to adequately analyze whether the temporary loss of 1.59 acres of LA State Historic Park near its southwest entrance is significant, and if it is significant, for failing any attempt to mitigate the significant impact.

Response GO14-172 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The Draft EIR addresses the temporary closure of a portion of Angeles State Historic Park in Section 3.16, Parks and Recreational Facilities. As discussed on page 3.16-16 of the Draft EIR, construction of the Chinatown/State Park Station would not require any closures of areas used for recreation. The Draft EIR analyzed all potential environmental impacts to the Los Angeles State Historic Park, including in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Consideration. Refer to Section 3.16, Parks and Recreational Facilities, for a discussion of how construction of the proposed Project would result in less than significant impacts to the Los Angeles State Historic Park.

As discussed on pages 3.16-16 to 3.16-17 and 3.16-22, in Section 3.16 of the Draft EIR, while construction of the proposed Project would require a brief and temporary closure of the southernmost corner and western edge of the Los Angeles State Historic Park beneath the cables for safety purposes, other options for pedestrian access, including the provision of pedestrian detours during construction, would allow for continued pedestrian access within the Project area. In addition, park patrons would still be able to access approximately 30 acres of the 32-acre Los Angeles State Historic Park, including all the recreational areas, during construction activities within the park. In addition, regular park patrons are familiar with temporary park closures as they often occur in conjunction with concerts, fairs, and festivals that take place within the park throughout the year. It is not anticipated that construction activities at the southernmost portion of the park would increase the use in other areas of the park or at other parks and recreation

facilities such that substantial physical deterioration of the facility would occur or be accelerated as the portion where construction activities are occurring is primarily landscape and hardscape. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project, including to the Los Angeles State Historic Park. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant.

Comment GO14-173 J. The Project Alternatives Section Must be Revised to Include Additional Feasible Alternatives, Including a Revised TSM Alternative.

The DEIR identifies the Transportation Systems Management (TSM) Alternative as the Environmentally Superior Alternative, but goes to great lengths to argue the alternative meets too few project objectives to be worthy of consideration.

But this is only because the project alternatives are constrained by artificially narrow project objectives. (See discussion, supra pp. 43-46; see also WATER, 78 Cal.App.5th at 692.) Of the objectives the DEIR asserts the TSM alternative does not meet, four are the result of project objectives plainly chosen to favor the aerial rapid transit system over other feasible alternatives, defining the feasible TSM alternatives out of consideration (these are objectives 2, 7, 8, and 12). The DEIR's support for its conclusion that the preferred alternative meets two others is largely speculative, not based on substantial evidence, and the result of ignoring reasonably foreseeable indirect changes in the environment due to the project (these are objectives 5 and 9). The remaining two objectives could easily be met by the TSM Alternative with only minor modifications (objectives 10 and 11). (In fact,

it is unclear why Metro would not attempt to meet objective 11 in all transportation projects it considers—why would it purposely design a project alternative in a way that doesn't attempt to minimize the alternative's environmental footprint?)

The TSM Alternative's design suffers from a conveniently terrible lack of imagination considering it is proposed by one of California's largest public transportation agencies, serving the largest county (by population) in the United States, for a project that was initially proposed to Metro's "Office of Extraordinary Innovation."

The TSM Alternative should be minimally revised:

- To travel not only from LA Union Station, but from other sites Metro identifies as appropriate collection points (noting that the current DSE already operates a line directly from the South Bay);
- To use electric buses, which would eliminate GHG emissions in the Project area, the same as the preferred alternative.

Additional benefits of the revised TSM Alternative would be an expanded fleet of electric buses, which would not be required to travel within only the Project area, but which could be readily available for other uses when not needed for transit to Dodger Stadium games and events. These uses have the potential to greatly reduce VMT and GHG not only within the Project area, but over the entire Metro service area.

Response GO14-173 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Refer to Response G014-88 for discussion of how the proposed Project's objectives are consistent with CEQA and do not unnecessarily preclude feasible project alternatives. As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Response G014-91 for discussion of a system of buses from numerous remote locations throughout the Los Angeles region to

and from Dodger Stadium events. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment GO14-174 Other feasible alternatives to consider are included in the 1990 LACTC Study. (See discussion, supra p. 42 fn. 43 (Exhibit O).) Particularly worthy of consideration is the escalator/walkway option, which has a very large capacity (approaching half of the stadium capacity), relatively low cost, and low total travel time (including waiting and boarding). (Id., pdf. p. 7.)

Response GO14-174 Refer to Response GO14-86 for a detailed response to the 1990 Dodger Stadium Transit Access Study prepared by Gruen Associates for Los Angeles County Transportation Commission. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment GO14-175 CONCLUSION

Based on all of the above and on other comments and objections by others incorporated by reference herein, the Draft Environmental Impact Report must be revised and recirculated or the Project must be withdrawn from consideration and the environmental review terminated.

Thank you for your consideration of these comments.

Sincerely,

John Given

Response GO14-175 This comment provides a general conclusion regarding the comments raised in this letter. Responses to all comments contained in this letter are provided in Comments GO14-2 through GO14-175. This comment and the comments raised in

this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter GO15 – Homeboy Industries

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO15

Comment GO15-1 Dear Mr. Zelmer:

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

Response GO15-1 This comment provides a general introduction to the comments raised in this letter. Responses to comments contained in this letter are provided below in Responses GO15-2 through GO15-16.

Comment GO15-2 Homeboy Industries stands to be one of the most heavily impacted community stakeholders if the gondola is allowed to proceed as proposed. We will be affected with significant unmitigated environmental impacts during construction and by permanent effects on our operations.

Response GO15-2 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. Refer to Responses GO15-8 and GO15-9 for detailed discussion of construction noise impacts. Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support Program during construction of the proposed Project. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment GO15-3 We refer you to our letter to Metro dated November 16, 2020 for a detailed enumeration of our original concerns. While we concur generally with other community stakeholders in their current comments on the DEIR, we would like to point out the following areas of specific concern to Homeboy.

First of all, the document refers to Homeboy Industries as an "office building." The DEIR assesses potential environmental impacts against standards applicable to commercial structures. Homeboy Industries is, in fact, much more than an office; it is a highly-venerated, community-based non-profit that is the largest gang rehabilitation and re-entry program in the world. We provide training and support for

thousands of formerly gang-involved and previously incarcerated people, allowing them to redirect their lives and become contributing members of our community.

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

Response GO15-3 The Draft EIR analyzed the potential construction and operational impacts to Homeboy Industries in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. For example, refer to Section 3.03, Air Quality, of the Draft EIR, for discussion of sensitive receptors in the air quality context. In addition, refer to Section 3.13, Noise, of the Draft EIR for discussion of identification of Noise-Sensitive receptors (NSR) and Vibration-Sensitive receptors (VSR) in the noise and vibration context. As detailed in Responses GO15-8 and GO15-9, Homeboy Industries was considered a sensitive receptor for purposes of the assessment of noise and vibration impacts in Section 3.13, Noise, of the Draft EIR.

Comment GO15-4 Following the outline of the DEIR, we note these areas of greatest concern:

1. Project Description

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

Response GO15-4 Refer to Section 2.0, Project Description, of the Draft EIR, which details the proposed Project's alignment, noting that the proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR includes additional detail and graphics as to the proposed Project alignment, including portions of the alignment over public ROW, publicly owned property, and private properties. The proposed alignment profile also is provided in Appendix Q, Proposed Alignment Plan and Profile. In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are not readable due to the scale of the graphics, Appendix Q has been updated to add larger inlets of several graphics. Appendix O, Supplemental Graphics of Proposed Project Plan and Profile, of this Final EIR includes larger scale version of these graphic. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would meet and anticipates exceeding the American National Standards Institute (ANSI) Standard B77.1, which regulates vertical and horizontal clearances. ANSI B77.1 includes two criteria, both of which must be met, for horizontal clearance between the cabin and

an adjacent element: when hanging vertically, the cabins must be no closer than five feet to any obstruction that is not part of the ropeway system; and when the cabins are tilted within a prescribed range (as from wind), the cabins must not come into contact with anything. For the proposed Project, the five-foot requirement is slightly wider than the swing requirement, so the five-foot requirement controls the design path width. The proposed Project would include five feet on each side of the vertically hanging cabins for a required aerial clearance width of 53 feet 2 inches. Based on the current design, the Additional Separation Buffer is estimated to be approximately 10 feet on each side of the required aerial clearance width. Figure 2-8 in Section 2.0, Project Description, of the Draft EIR, shows the portions of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property, which are described more specifically in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR. As shown on Figure 2-8 and Appendix Q, the ANSI-required aerial clearance is not above Homeboy Industries' current premises at 130 Bruno Street. The Additional Separation Buffer is an approximate width and based on the current design of the proposed Project. The edge of the Additional Separation Buffer is approximately adjacent to the property line of 130 Bruno Street, and the final width of the Additional Separation Buffer would be determined by the appropriate agencies during the permitting process for the proposed Project.

Comment GO15-5 2. Hope Village - Housing & Service Expansion in Support of Alternatives to Incarceration

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

Response GO15-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how consistent with the Project Objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. The proposed Project does not impact Homeboy Industries' anticipated housing project, and the Alpine Tower's location avoids the anticipated 903 North Main Street Homeboy housing project. As discussed in Topical Response E, the proposed Alpine Tower is sited on 901 North Main Street and Homeboy Industries' anticipated housing project is located on 903 North Main Street. In addition to the proposed

Project's Alpine Tower not being physically located on the site of Homeboy Industries' anticipated housing project, the minimal aerial rights required for the proposed Project do not conflict with or impact the anticipated Homeboy Industries housing project.

Comment GO15-6 3. Aesthetics

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

Response GO15-6 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including the Alpine Tower, which would be less than significant, and for visual simulations of the proposed Project's towers. The methodology utilized to identify visual resources/viewsheds and examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). Further, views and potential impacts were all analyzed using the same thresholds of significance identified by the State CEQA Guidelines and the Los Angeles CEQA Thresholds Guide. Part of this process was identifying and analyzing Landscape Units (LUs) and Key Observation Points (KOPs) that were delineated based on known significant views and locations with proposed changes to the setting. Specifically, Landscape Unit 3, in which Homeboy Industries is located, is addressed on pages 3.1-22 and 3.1-42 through 3.1-45 of the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alpine Tower. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment GO15-7 Further, most CEQA analyses include a Shade and Shadow study. One would be appropriate for this project as well.

Response GO15-7 While shading is not a required analysis area in the CEQA Guidelines, a shadow analysis was conducted as part of the Visual Impact Assessment per recommendations in the L.A. CEQA Thresholds Guide. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR for the shading

analysis, which determined that shading impacts would be less than significant for construction and operational impacts. The shading analysis for the Alpine Tower is included at pages 3.1-54 of the Draft EIR, and concluded that the Alpine Tower would not result in the shading of shade-sensitive uses for more than three hours between the hours of 9:00 am and 3:00 pm Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 am and 5:00 pm Pacific Daylight Time (between early April and late October). As such, shade impacts from the Alpine Tower would be less than significant. Refer to the Shade/Shadow Diagrams for the proposed Project, included in Appendix B, Shade/Shadow Diagrams, of Appendix C, Visual Impact Assessment, of the Draft EIR, for the shade/shadow assessment of the proposed Project. The shade/shadow diagrams for the Alpine Tower are on pages 39 through 57 of Appendix B, Shade/Shadow Diagrams, to Appendix C, Visual Impact Assessment, of the Draft EIR.

Comment GO15-8 4. Noise and Vibration

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

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

Response GO15-8 This comment provides a general summary of construction noise at NSR 7, as shown on page 3.13-36 of Section 3.13, Noise, of the Draft EIR. The identified noise level of 80.3 dBA is associated with the foundations and columns phase for construction of the Alpine Tower. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of noise and vibration impacts during construction of the proposed Project.

CEQA Guidelines section 15064.7(b) encourages lead agencies to adopt and publish thresholds of significance for use in determining whether environmental impacts are significant. While agencies are encouraged to adopt such thresholds of significance for general use, they are not required to do so and have the authority to determine the significance of environmental impacts on a project-by-project basis. Consistent with CEQA, Metro used the thresholds of significance from Appendix G to the CEQA Guidelines in the Draft EIR. For the analysis of noise and vibration, the Draft EIR used the thresholds of significance from Appendix G to the CEQA Guidelines and evaluated whether the proposed Project would result in the generation of a substantial temporary or permanent increase in ambient noise levels or the generation of

excessive ground-borne vibration or ground-borne noise levels. As part of this analysis the Draft EIR evaluated standards of both Metro as a Lead Agency and the City as a responsible agency. Specifically, Metro applies the FTA impact criteria for both noise and vibration. The City utilizes thresholds from the City's 2006 L.A. CEQA Thresholds Guide and the LAMC for noise, which are generally not utilized by Metro, but are included for purposes of this Draft EIR. For vibration, the City of Los Angeles also uses the FTA impact criteria. Based on the L.A. CEQA Thresholds Analysis NSR 7 (Homeboy Industries) would experience a temporary, significant noise impact during construction activities of the Alpine Tower, which, as discussed in Appendix B, Construction Assumptions, of the Draft EIR, would be approximately 11 months. As described in Section 3.13, Noise, of the Draft EIR, based on the FTA guidelines the construction activities of the Alpine Tower would not result in significant noise impacts at NSR 7 (Homeboy Industries). As discussed in Section 3.13, Noise, of the Draft EIR, for the entire duration of construction, the proposed Project shall provide an 8-foot temporary noise barrier between the construction site and NSR 7 (Homeboy Industries). With the implementation of Mitigation Measure NOI-A, the L.A. CEQA Thresholds Analysis construction noise impact during the Vertical Circulation, Hardscape, Landscape, and Interior Work phase at NSR 7 (Homeboy Industries) would be reduced to less than significant. Implementation of Mitigation Measure NOI-A would be required to reduce the L.A. CEQA Thresholds Analysis impacts at NSR 7 (Homeboy Industries), however, the L.A. CEQA Thresholds Analysis noise impacts at NSR 7 would remain significant and unavoidable during the foundations and columns and structural steel and gondola equipment erection construction phases.

CEQA requires that a Statement of Overriding Considerations be prepared if a proposed project will result in significant unmitigated environmental impacts. (CEQA Guidelines, §§ 15092(b)(2)(B).) The Statement of Overriding Considerations must set forth why any remaining significant effects on the environment found to be unavoidable under CEQA Guidelines section 15091 are acceptable due to overriding concerns as described in CEQA Guidelines section 15093. This statement would supplement the lead agency's findings required by Public Resources Code section 21081, subdivision (a), to support the lead agency's determination to proceed with a proposed project despite adverse environmental effects. Because the proposed Project would result in significant environmental impacts related to construction noise, as discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, which would not be reduced to less than significant with implementation of Mitigation Measure NOI-A, Metro would prepare a Statement of Overriding Considerations concerning this construction noise impact to supplement its Findings if it approves the proposed Project.

Comment GO15-9 In the analyses of potential vibration impacts, Homeboy Industries is VSR-11, but is not called out as a Measurement Location. Therefore, no specific information about the impacts of drilling (or driving) 120-foot deep (sic) piles adjacent to our training rooms, kitchen and restaurant is provided. Nonetheless, the DEIR concludes that

Homeboy Industries would experience significant "annoyance" from vibration, even with mitigation, during construction (page 3.13.63). A more detailed and site-specific analysis of the vibration impact on our buildings and operations would be appreciated.

Response GO15-9 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, and as shown in Tables 3.13-11 and 3.13-27, Homeboy Industries is identified as both a noise-sensitive receptor (NSR), and a vibration-sensitive receptor (VSR). Specifically, for the noise analysis, as shown in Table 3.12-11, Homeboy Industries is identified as NSR 7. For the vibration analysis, as shown in Table 3.13-27, Homeboy Industries is identified as VSR 11. As noted on page 71 of Appendix M of the Draft EIR, "A construction vibration impact analysis was conducted for those vibration-sensitive receptors (VSRs) that were located within approximately 200 feet of each Project component site. This distance was chosen because vibration attenuates with distance and, at 200 feet, vibration levels for the highest vibration producing equipment for construction of the proposed Project (vibratory rollers) would be less than the most restrictive vibration level (0.12 in/sec PPV) and, therefore, the Project would not impact VSRs beyond 200 feet." As discussed on page 3.13-27 of the Draft EIR, "ground-borne vibration impacts due to the proposed Project's construction activities were evaluated for both on-site and off-site construction activities by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the proposed Project's activities to the applicable vibration significance thresholds. Construction-related vibration is assessed using two different metrics: 1) to assess potential structural damage from vibration and 2) to assess human annoyance from vibration. " As discussed on page 5 of Appendix M of the Draft EIR, "Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep." As noted on pages 3.13-13 to 3.13-15 of the Draft EIR, the evaluation of vibration impacts relied on the FTA guidelines to establish the threshold of significance for building damage and human annoyance from vibration. The FTA guidelines' vibration criteria for building damage are listed in Table 3.13-8 of the Draft EIR. The FTA guidelines' vibration criteria for human annoyance are listed in Table 3.13-6 of the Draft EIR. As discussed in Section 3.13, Noise, of the Draft EIR, the noise-sensitive receptors (NSRs) identified in Table 3.13-11 at various measurement locations represent existing noise conditions in a variety of locations throughout the Project area. Unlike the existing ambient noise conditions used for the noise analysis, existing vibration levels are not typically considered in the assessment of project vibration impacts, so existing vibration levels were not measured for the proposed Project, as discussed at 3.13.3.3, Existing Vibration Conditions, in Section 3.13, Noise, of the Draft EIR. Homeboy Industries is recognized as VSR-11 in Figure 3.13-27 of the Draft EIR. Additionally, the potential vibratory effects that would be experienced at Homeboy Industries during construction of the Alpine Tower are shown on

Table 3.13-28. Specifically, VSR-11 would experience vibration at 0.16 PPV in/sec (92 VdB) during construction of the Alameda Tower. This would exceed the threshold for human annoyance, but not building damage. Thus, construction vibration (human annoyance) impacts would be significant and unavoidable even with implementation of Mitigation Measures VIB-A and VIB-B. As discussed on page 3.13-72 of the Draft EIR, "[s]ince the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction, there is no feasible method for mitigating human annoyance impacts. It should be noted that because the human annoyance threshold is so low it is already exceeded on roadways by existing truck trips." The Draft EIR included a complete analysis of vibration impacts for Homeboy Industries (VSR 11) as required by CEQA.

Comment GO15-10 5. Transportation

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

Response GO15-10 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to affect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City of Los Angeles and with robust feedback from community stakeholders, a parking management plan. The City of Los Angeles would implement any on-street parking management strategies identified.

Comment GO15-11 Clearly, potential construction period impacts would be manifold. We would like to see focused analyses of the impacts of proposed road closures on local streets including Alameda, Bruno, Alpine and Main.

Response GO15-11 The Draft EIR includes a detailed description of road closures and associated construction period effects on the roadway system on pages 3.17-45 to 3.17-66 of Section 3.17, Transportation. Appendix B, Construction Assumptions, of the Draft EIR includes further detail of construction assumptions, including detailed graphics that illustrate work zones and temporary closures and temporary intersection lane configurations during construction. Temporary lane closures and temporary lane configuration changes for Alameda Street, Alpine Street, and Main Street are shown. No construction period lane closures or lane configuration changes are anticipated on Bruno Street. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, Los Angeles Union Station (LAUS), and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Access to Homeboy Industries would be maintained at all times during proposed Project construction. In addition, the *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment* includes a detailed construction period transportation simulation of the road closures during the proposed Project construction. This report substantially exceeds the level of detail required by the TAG.

Comment GO15-12 Also, there is no explanation in the DEIR about where visitors to the gondola might park in our neighborhood and what the impact of moving "game day" traffic to Chinatown and its environs might cause. The traffic study in the DEIR seems purposefully oblivious to potentially severe impacts on automobile access, circulation and parking.

Response GO15-12 Refer to Response GO15-10 for discussion of the Non CEQA Transportation Assessment, including traffic congestion (i.e., circulation) and parking.

Comment GO15-13 6. Impact on Our Business Revenue

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

Response GO15-13 Refer to Topical Response C, Project Features, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be

minimized. The Project Sponsor would also create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. In addition, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/ last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and Dodger Stadium Station, which could also drive customers to businesses along the proposed Project alignment.

Comment GO15-14 7. Financing & Use of Public Funds

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

Response GO15-14 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how no funding benchmarked for housing projects or development will be used to fund or finance the proposed Project.

Comment GO15-15 8. Other Considerations

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

First, we are clearly concerned about the permanent effects that the gondola might have on our sensitive, human-serving operations at 130 Bruno Street and on our future growth- even on the viability of our operations at this location – if the project

goes ahead as proposed. These longer-term operational and economic considerations should be discussed now, but the CEQA process may not be the best forum for resolving them.

Response GO15-15 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how consistent with the Project Objectives, the proposed Project was designed in consideration of planned housing projects, as well as with existing adjacent or potential future land uses in mind, including the Restorative Justice Master Plan and Hope Village Project and Homeboy Industries' existing operations at 130 Bruno Street. The proposed Project will not displace housing or prevent planned housing

Comment GO15-16 Second, there is a perception in our neighborhood that the gondola is being proposed as a precursor – "pre-mitigation" perhaps – to larger plans for development on the stadium parking lots. While these plans are not in our purview to address now, we do believe that further development around the gondola end-station would exacerbate the environmental concerns we are considering at this time, and should be brought into play as part of this evaluation.

Sincerely,

Thomas J. Vozzo
Chief Executive Officer, Homeboy Industries

CC: Metro Board, Board Clerk
Los Angeles City Mayor Karen Bass
Fr. Gregory Boyle, Founder, Homeboy Industries
California State Assembly Member Wendy Carrillo
Steve Delgado, Chief Operating Officer, Homeboy Industries
Los Angeles City Councilmember Eunisses Hernandez, City District 1
Martha Jimenez, Executive Vice President/General Counsel, The California Endowment
Dr. Robert Ross, CEO, The California Endowment
California State Assembly Member Miguel Santiago
Los Angeles County Board Supervisor Hilda Solis, County District 1
Adrian Vasquez, District Director for Congressperson Jimmy Gomez
Marisela Vihar, District Director for Assembly Member Wendy Carrillo

Response GO15-16 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Commenters' speculation or mere "perception" regarding a potential future action, without the presence of any

application or evidence of a larger project, does not require a lead agency to analyze the broader scheme or otherwise attribute motives to an applicant based on these allegations alone.

Comment Letter GO16 – Los Angeles Conservancy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO16

Comment GO16-1 Dear Mr. Cory Zelmer:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Los Angeles Aerial Rapid Transit (LA ART) Project. In reviewing this proposed Project, the Los Angeles Conservancy has serious concerns regarding its associated and cumulative impacts, both directly and indirectly. We strongly question the purpose and need for such an undertaking as there are environmentally superior alternatives readily available and appear to be dismissed without a clear substantiation.

Response GO16-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO16-2 through GO16-25.

Comment GO16-2 The Conservancy raises concern about Metro serving as the lead agency for the California Environmental Quality Act (CEQA) process. It appears that the City of Los Angeles is better equipped and appropriate to serve in this role, and analyze potential impacts, conflicts, and identify project alternatives and appropriate mitigation measures.

Response GO16-2 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro has primary responsibility for implementation of the proposed Project, and is the proper lead agency. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Refer to Response G016-20 for discussion of how the City was properly designated as a responsible agency.

Comment GO16-3 Lastly, we strongly question if there is a need for Federal review as a companion for this proposed undertaking, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act.

Response GO16-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is

warranted. As proposed, the proposed Project does not require Federal review, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act.

Comment GO16-4 If constructed, the LA ART Project would connect Los Angeles Union Station to Dodger Stadium property via an aerial gondola system. The proposed Project would include stations at Alameda and Cesar Chavez, the southernmost entrance to the Los Angeles State Historic Park, as well as at Dodger Stadium. The LA ART gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins.

Response GO16-4 This comment provides a general summary of the proposed Project provided in Section 2.0, Project Description of the Draft EIR. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO16-5 I. Purpose and need for LA ART is not fully demonstrated when environmentally superior alternatives are identified and available to be implemented.

The Draft EIR analysis does not make a compelling case for the purpose and need for this Project, especially given there are other alternatives that may achieve similar results, while minimizing and avoiding the adverse effects (both direct and indirect). The stated purpose for the proposed Project is to "improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit (ART) service connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities via three new transit stations." However, the No Project Alternative and The Transportation Systems Management (TSM) Alternative are both found to be environmentally superior to the proposed LA ART Project.

Response GO16-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. The Draft EIR determined that the No Project and Transportation Systems Management Alternatives would not provide the same level

of benefits of the proposed Project such as the ability to reduce vehicle miles traveled and to air quality through reduced emissions, to energy through reduced fuel usage, to greenhouse gas emissions through reduced emissions, and to hydrology and water quality through the implementation of LID source control and BMPs to minimize water runoff and water pollution or otherwise achieve the overall Project purpose of providing a permanent and direct transit connection between the Los Angeles Union Station and the Dodger Stadium property. CEQA requires the analysis of a "No Project" alternative as well as the identification of an "environmentally superior" alternative from the range of reasonable alternatives that are evaluated, which cannot be the "No Project" alternative or the underlying project. The statutorily required identification of these alternatives does not negate the need for the proposed Project.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment GO16-6 Overall, there are three project alternatives identified. These include a No Build Alternative, the Spring Street Alignment Alternative, and the TSM Alternative. The Spring Street Alignment is similar to the proposed project in that it will construct an aerial transit system. However, instead of a station at the southern end of Los Angeles State Historic Park, it would construct a station on the western edge boundary near Sotello Street. This alignment would have the same impacts as the proposed Project and therefore the Conservancy holds the same concerns.

Response GO16-6 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. As identified in Section 4.0, Alternatives (Table 4-1 and page 4-59), the Spring Street alternative would have similar impacts as

the proposed Project but would not meet all the proposed Project's objectives to the same degree.

Comment GO16-7 The TSM Alternative would improve the already existing and popular Dodger Stadium Express (DSE) bus system, therefore requiring none of the aerial transit infrastructure. This alternative, as the environmentally superior alternative, would reduce all possible impacts tied to the construction and operation of an LA ART system.

Response GO16-7 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative, pursuant to CEQA. Refer to Response GO16-5 for a discussion of how the Transportation Systems Management Alternative would not provide the same level of benefits as the proposed Project. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. While the Transportation Systems Management alternative would not have the impacts associated with the construction of an ART system, it would have operational effects that would not be present for the proposed Project, including increased vehicle queuing on city streets and increased potential for bus-pedestrian and bus-vehicle collisions, as detailed on page 4-72 and 4-73 of the Draft EIR. It is also not expected to reach the ridership of the proposed Project due to its considerably longer travel time and would therefore not have the VMT reduction benefit of the proposed Project, as described on page 4-71 of the Draft EIR.

Comment GO16-8 A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."[1] To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."[2] The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.[3] Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."[4] Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.[5]

Despite the analysis' failure to explore an electric bus system the TSM remains the environmentally superior alternative. It is likely that new regulations in the coming years will require electric bus systems allowing the TSM to meet the zero emissions

goals for Project Objectives 5 and 12. We believe an enhanced bus route, especially on non-event days would better serve the surrounding neighborhoods and Elysian Park and therefore meet Objective 9. A more robust DSE is likely to resolve many last mile dilemmas for nearby residents and visitors.

The existing DSE is an incredible resource for Dodger fans, shuttling thousands of fans each game. The system is limited in its current ability to attract more fans because the route is underserved and busses are often packed to maximum capacity. Enhancing the system through the TSM Alternative, by offering more frequent departures and a zero emission fleet, would attract many more riders on event days and beyond. Additional stops during non-event periods provide greater access to Elysian Park and would further benefit the community by providing a more equitable mode of access.

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

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

Footnote 3: Guideline § 15126.6(a).

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

Footnote 5: Public Resources Code § 21081.5.

Response GO16-8 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The Draft EIR is in compliance with CEQA's general policies related to environmental quality and consideration of alternatives to proposed actions affecting the environment, and appropriately identifies the significant effects on the environment of the proposed Project, as well as potential alternatives to the proposed Project, in Sections 3.0 and 4.0, Environmental Analysis and Alternatives, of the Draft EIR, respectively. Refer to Responses G016-5 and GO16-7 regarding the Transportation Systems Management Alternative. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options for a discussion of how the Draft EIR considered a reasonable range of alternatives, and there are no feasible alternatives available which would avoid or substantially lessen the proposed Project's significant environmental effects. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents, park uses, visitors, and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open

space enhancements, the Community Access Plan for fares, access to parks, including Elysian Park, and mobility hubs. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response N, Environmental Justice, for a discussion of how the proposed Project is consistent with Metro's goal of prioritizing equity opportunities. The comment incorrectly characterizes California law. Pub. Resources Code § 21002 states, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so. If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations."

Per Section 15092 of the CEQA Guidelines, a public agency may decide to approve or carry out a project for which an EIR was prepared if it has determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

Comment GO16-9 II. Historic and cultural resources and view sheds will be impacted and irreparably harmed by the LA ART Project

A visual intrusion as a result of the proposed project is clearly evident. If built, the LA ART will be clearly visible and obscure the view, setting, and future overall experience of various historic places and spaces, including Union Station, El Pueblo, Los Angeles State Historic Park, and Chinatown.

The Conservancy disagrees believes the proposed project would have significant impacts to numerous historic resources by altering their historic settings and overall feeling. At the southern terminus of the project, the proposed Alameda Station would significantly impact both Union Station and El Pueblo's historic setting and feeling. One of the most important character defining features of Union Station are the views of its primary façade along Alameda. As metro is aware, Union Station is the last major

railroad station to be built in the United States. Its gardens and patios have welcomed countless travelers to sunny California for nearly a century. In 1972, the City of Los Angeles designated Union Station Historic-Cultural Monument #101 and it was added to the National Register of Historic Places in 1980.

Response GO16-9 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including LAUS, El Pueblo, Chinatown, and the Los Angeles State Historic Park. Refer to Responses GO16-10 through GO16-14 for additional discussion of aesthetic impacts to LAUS and El Pueblo, which would be less than significant and for discussion of Alameda Station.

The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment GO16-10 The imposing new LA ART station along Alameda, with passenger plazas shown extending into the National Register and HCM boundaries, would dramatically alter the visitor's experience of Union Station when walking or driving south from Cesar Chavez Avenue as well as when exiting the station. Should the project be constructed, the current setting would no longer exist. Views of Union Station's iconic palm tree lined motor court and rising clock tower would be prematurely shrouded from the north. Alameda would go from an open airy corridor to one that compresses the passerby below a massive structure that crowds the existing relationship between Union Station and El Pueblo. It is argued that the Mosaic Apartments already contribute to the erasure of this view shed, however the LA ART Project only exacerbates and amplifies this by making the impact much worse and more impactful as it encroaches onto the Public Right-Of-Way. Metro previously proposed acquiring Mosaic property and developed plans to redevelop this site and restore the full view shed to Union Station; this Project would completely foreclose this future opportunity.

Response GO16-10 Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo), the *El Grito* mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than

significant. While the proposed Project's Alameda Station would be a visible change to the overall setting of the historical resource, as discussed on page 16 of Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR, integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area (i.e., addition of the proposed Project) should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property. As discussed on pages 3.5-49 and 3.5-50 of the Draft EIR, the Los Angeles Union Station Passenger Terminal and Grounds is designated for its architectural and historical significance, and the changes to the resource's setting resulting from the addition of Alameda Station would not impact its architectural significance or its ability to convey this significance. Specifically, as indicated on page 3.5-44, in Section 3.05, Cultural Resources, of the Draft EIR, construction impacts will not alter the physical integrity or character-defining features of the historical resource. Also, as indicated on page 3.5-49, operational features (i.e., vertical circulation elements) will have a direct impact on the property generally, but will not alter the physical integrity or character-defining features of the historical resource. Further, visual alterations to the overall setting of the property will be insignificant due to prior substantial alterations to the existing setting and will not impact the significance of the historical resource nor its ability to convey its significance. Overall, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant. In addition, Metro does not have current plans to acquire and redevelop the Mozaic property.

Comment GO16-11 In 2015, when Metro approved the Connect US Action Plan, the restoration of the Forecourt and Esplanade improvements were contemplated, as a means to strengthen the connections and "front door" between Union Station, El Pueblo and Olvera Street. As we currently understand, this project is now on hold due to consideration of the proposed Project. Not only is this delay unfortunate, the LA ART station greatly undermines this opportunity and crowds the historic resources, greatly disrupting and indirectly interrupting the feeling and setting of these spaces and their relationships to one another. Further, queueing for the Alameda Station would occur within the planned Forecourt and Esplanade area and north of the Placita de Dolores, crowding these areas and again changing the ways in which these historic, public spaces have been, currently are, and could be experienced in the future.

Response GO16-11 Metro's plans for and consideration of the LAUS Forecourt and Esplanade Improvements Project is not "on hold" due to the proposed Project, which was designed in consideration of and to be compatible with the planned LAUS Forecourt

and Esplanade Improvements Project, as discussed in Section 2.0, Project Description, of the Draft EIR. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for a discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt.

Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR, for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. The existing parking lot and planned LAUS Forecourt where vertical circulation elements would be introduced are not considered character defining features of the Los Angeles Union Station Passenger Terminal and Grounds. While the proposed Project's Alameda Station would be a visible change to the overall setting of the historical resource, as discussed on page 16 of Appendix G, integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area (i.e., addition of the proposed Project) should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property. As discussed on pages 3.5-49 and 3.5-50 of the Draft EIR, the Los Angeles Union Station Passenger Terminal and Grounds is designated for its architectural and historical significance, and the changes to the resource's setting resulting from the addition of Alameda Station would not impact its architectural significance or its ability to convey this significance. Specifically, as indicated on page 3.5-44, in Section 3.05, Cultural Resources, construction impacts will not alter the physical integrity or character-defining features of the historical resource. Also, as indicated on page 3.5-49, operational features (i.e., vertical circulation elements) would have a direct impact on the property generally, but will not alter the physical integrity or character-defining features of the historical resource. Further, visual alterations to the overall setting of the property will be insignificant due to prior substantial alterations to the existing setting and will not impact the significance of the historical resource nor its ability to convey its significance. Overall, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant. Refer to Response GO16-13 for a discussion of the proposed Project's potential impacts to the Los Angeles Plaza Historic District. Refer to Response GO16-14 for a discussion of the proposed Project's potential impacts to Olvera Street. Refer to Response GO16-15 for a discussion of the proposed Project's potential impacts to the Placita de Dolores. Regarding the relationship between LAUS and El Pueblo,

Section 3.05, Cultural Resources, of the Draft EIR analyzes the axial connection and visual relationship between LAUS and El Pueblo. The proposed Alameda Station would be located over 100 feet north of the main axis—at the intersection of Los Angeles Street and Alameda Street—between LAUS and El Pueblo. The location is sufficiently offset so it would not interrupt the physical and visual relationship between the two historical resources. Accordingly, the important axial connection and visual relationship with the between LAUS and El Pueblo would remain.

Comment GO16-12 The renderings provided in the Draft EIR do not fully depict and illustrate the visual impacts of the proposed new station on Union Station. The siting of the renderings provided are from locations that appear to diminish them. In consultation with project team consultants, the Conservancy has requested additional renderings from various points along Alameda south of East Cesar E. Chavez Avenue, and as a pedestrian will experience leaving the primary entrance of the station and the expanse of the pedestrian plazas proposed on either side of Alameda. Due to the holidays and the deadline to comment on Draft EIR, these have not yet been provided and are not included in the draft EIR. If adequately illustrated and included in the EIR, the Conservancy believes the full range and visual impacts of the proposal station will be evident. These images should be modified and accurately depicted to show the full extent of the undertaking and impact on the broader community view shed.

Response GO16-12 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of Key Observation Points (KOPs), of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for KOPs and simulations updated in part to provide additional aesthetic and visual illustrations in response to comments received on the Draft EIR during the public review period. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for an analysis of the Supplemental KOPs in Response to Comments, which confirmed the Draft EIR determination that aesthetic impacts of the proposed Project would be less than significant. As discussed in Section 3.01, Aesthetics, of the Draft EIR, identification of potential aesthetic and visual impacts included the identification of Landscape Units (LU) that defined particular viewsheds and/or aesthetic settings within the proposed Project area, as well as KOPs within each LU that are representative of the visual character of the area. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. As noted, pages 35-37, 41-42, and 55-61 in Appendix C, Visual Impact Assessment, of the Draft EIR, LU 1 extends from Arcadia Street to Cesar E. Chavez Avenue along Alameda Street and includes seven (7) KOPs, three (3) of which include views of or from LAUS along or immediately adjacent to Alameda Street south of Cesar E. Chavez Avenue (KOPs 1, 2, 4).

Comment GO16-13 The Los Angeles Plaza Historic District, better known as El Pueblo, is a collection of some of Los Angeles's earliest historic resources dating to 1818. In 1970, the Los Angeles Plaza Park was designated as Historic-Cultural Monument (HCM) #64 and initially listed on the National Register in 1972. As shown in project renderings, the Alameda station with its wires and gondolas would be visible from various locations within the historic district.

From within the historic Avila Adobe's courtyard, constructed in 1818 and the oldest extant building in the City, the new station stands looming overhead. The project team has stated that this view shed was already compromised by the One Gateway Plaza at Patsaouras Transit Plaza. However, this tower is not immediately adjacent to the adobe. Even with One Gateway Plaza in the far distance, visitors are allowed the ability to spatially visualize how the vista appeared at the time of its construction. Without question, the LA ART's Alameda's station's proximity and scale impact this historic site much more heavily than that of the tower roughly 1,500 feet away. Today's Avila Adobe successfully transports visitors to a time passed. With the new station, the Conservancy is confident that this would no longer be a possibility.

Response GO16-13 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Plaza Historic District. As discussed on pages 3.5-45 to 3.5-46 of the Draft EIR, the only direct impacts from the proposed Project would be to a non-contributing feature, the Placita de Dolores, which was constructed after the historic district was designated, and impacts would be less than significant. With respect to indirect impacts, while the proposed Project's Alameda Station would add another non-original element to the broader setting, mere visibility of a new building, structure, or feature from certain vantage points alone would not result in an indirect impact. The proposed Project would introduce a visible new feature to the historic district's setting, but Alameda Station, with the exception of the vertical circulation and associated alterations to the non-contributing plaza space, would be located outside of the historical resource's boundary, and contributing buildings would retain their visual and physical relationships with one another. As stated on page 3.5-51, visual alterations within the property would be less than significant due to prior visual alterations and will not impact the significance of the historical resources nor their ability to convey their significance. Also, as stated on page 3.5-52, the only historically significant viewshed from the Avila Adobe courtyard is the visual connection to LAUS. Although the proposed Alameda Station would add another non-original element to the broader setting, as the courtyard currently includes views of a portion of the Mozaic Apartments building, a portion of LAUS, a portion of the First 5 LA building, and a portion of the LA Metro Headquarters. The visual relationship between the Avila Adobe and LAUS would still exist. The Draft EIR does not rely on the presence of the comment's referenced "One Gateway Plaza" to reach this conclusion. Additionally,

Avila Adobe would retain its visual and physical relationships to the other contributors in the Los Angeles Plaza Historic District and would continue to convey its significance and the existing physical integrity and character-defining features of the historical resource would remain intact. Consequently, the indirect impact of the proposed Project on Avila Adobe, along with the Plaza Community Center, Plaza Substation, and The Winery, as well as the greater Los Angeles Plaza Historic District, would be less than significant.

Comment GO16-14 In Addition to the impacts at Avila Adobe, the project would be seen from other vantages including the north entrance to Olvera Street and from La Plaza. As stated previously, the station looming above the historic district would significantly impact the setting and feeling of Los Angeles's oldest historic built environment.

Overall, the Conservancy believe the various (sighting, proximity, signage, lighting, noise and construction) and cumulative (taken as a whole) impacts to the historic view shed, including greatly altering the feeling and setting of this historic area, are highly problematic and detrimental to the overall vitality of these historic resources. We believe this requires LA ART to reconsider other locations for placement of this station, and, more importantly, viable and environmentally superior project alternatives that do not require the need for this station nor LA ART as currently envisioned.

Response GO16-14 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.5, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe). As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources (inclusive of visual impacts related to the overall setting) would be less than significant. Refer to Response GO16-13 for a discussion of how visibility of a new building, structure, or feature from certain vantage points alone would not result in an impact to a historic resource, and how prior substantial alterations to the setting render the operational impacts less than significant. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. In addition, as discussed in Topical Response H, Section 6.0, Design

and Use Options, the Draft EIR includes design and use options responsive to public comments and stakeholder feedback. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of how the location of the Alameda Station was determined.

Comment GO16-15 III. Draft EIR does not adequately address the proposed use and transfer of public rights-of-way and lands, applicable general plans, permitted legal use, and is in conflict with Public Resources Code 5019.59

As described in the Draft EIR, the project would construct towers on the Alpine Parcel and Alameda Triangle. The former parcel being owned by the City of Los Angeles and latter being a Public right-of-way. With tower footprints at approximately 900 square feet, construction would occur on a sizeable portion of the parcels. Further, queueing for the Alameda Station would require the permanent use of public spaces for private use, including the Placita de Dolores and Union Station's planned Forecourt and Esplanade area.

The Conservancy is concerned about the use of publicly-owned parcels for private use, as detailed in the Draft EIR. We believe the project does not adequately describe the legal authority and process by which LA ART is required to attain such rights and makes inaccurate assumptions that the City and other public entities would give up their rights to these pieces of land. When looking at the Alpine Parcel in particular, other uses such as housing would better suit this site. With close proximity to City services and employment opportunities, the site is a good candidate for new, affordable housing construction. Given the need for affordable housing and limited land by which to build, as detailed in the City of Los Angeles' recently adopted Housing Element of the General Plan and stated Regional Housing Needs Assessment (RHNA) priorities, why then should the City give up this land for LA ART?

Response GO16-15 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, and Section 2.3.8, Project Objectives, for an overview of the proposed Project's objectives. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Refer to Section 2.0, Project Description, for a discussion of how the proposed Project was designed to be consistent with Metro's plans at LAUS, including the planned LAUS Forecourt and Esplanade Improvements Project, as well as for a list of required

permits and approvals for implementation of the proposed Project. The EIR is intended to provide environmental clearance as needed for all of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project.

Refer to Section 3.11, Land Use and Planning, for analysis of the proposed Project's potential impacts to land use and consistency with relevant land use plans, policies, and regulations adopted for the purpose of avoiding environmental effects. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of how nothing in Public Resources Code section 5019.59 would prohibit State Parks from issuing the necessary approvals for the Proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of queueing. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. As detailed in Topical Response E, development of housing is constrained on the portion of 901 North Main where the proposed Alpine Tower would be located due to the proximity to the Metro L Line (Gold) tracks. The proposed Alpine Tower would be located on a triangular portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets, and this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing. Specifically, the City recognized that the 901 North Main Street "site is bisected by overhead tracks, which are protected by an easement to" Metro and therefore "the Metro tracks will affect the ability to develop on the site." According to the City's publicly available property information system, ZIMAS, development and construction projects on 901 North Main Street must consult with Metro pursuant to Metro's Adjacent Development Review process to ensure safety and avoid conflicts to transit services and operations. The process applies to work within 100 feet from Metro right-of-way, which affects most or all of the 901 North Main Street property. In addition, compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street.

Comment GO16-16 As mainly a new tourist attraction, LA ART will attract an influx of visitors that will impact the authentic, lived experience of these historic spaces and places, not just in the area of Union Station and El Pueblo, but also Chinatown and the Los Angeles State Historic Park. As part of this concern, the Conservancy also questions the wisdom, appropriateness, and process by which various public rights-of-way and lands are to be granted for permanent use (for stations, towers, air rights, and queuing) to a private LLC and undertaking of this type.

How will these specific decisions take place and when, and does Metro, the City of Los Angeles, and/or the State Park and Recreation Commission (SPRC) have the legal authority to grant this type of commercial use to a private LLC in all the proposed locations? Our understanding is this project scope does not conform to the General Plan for El Pueblo Los Angeles State Historic Park[6] nor the Los Angeles State Historic Park.[7] Specifically, the statute for El Pueblo states, "[a]ny proposed demolition, alteration, or encroachment on historic structures must have approval from the State Department of Parks and Recreation." Commercial, privately-built and operated uses are generally excluded from approved activities. Therefore, the Draft EIR fails to fully identify or address this land use conflict that appears to make the preferred Project infeasible if access to these public lands (a necessity to build the Project) is not granted.

Footnote 6: Public Resources Code § 5002.2.

Footnote 7: Public Resources Code § 5019.50; 5019.59;

Response GO16-16 Refer to Response GO16-15 for discussion of the purpose of and need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of the General Plan for El Pueblo de Los Angeles State Historic Park. The El Pueblo de Los Angeles Historical

Monument is currently a department of the City of Los Angeles,[23] and the comment's cited code sections pertain to units of the State Park system. As discussed in Section 3.05, Cultural Resources, the City of Los Angeles, County of Los Angeles, and State of California signed an agreement in 1953 creating El Pueblo State Historic Park. The agreement allowed the State to purchase most of the property comprising El Pueblo State Historic Park. In 1992, the property within the Park was transferred to the City. In 1994, the Park's name was changed to El Pueblo de Los Angeles Historical Monument. The City's El Pueblo de Los Angeles Historical Monument Authority Department manages the El Pueblo de Los Angeles Historical Monument.

Comment GO16-17 The statute establishing the Los Angeles State Historic Park, for instance, is clear in stating exceptions in how private development can occur within the boundaries of the park, such as providing access, parking, sanitation, etc. Per the Draft EIR, the project would require an amendment to the State Historic Park General Plan which does not currently allow for transit on its grounds or within its air rights. The amendment would use "access" as defined in PRC 5019.59 to justify said amendment. However, the proposed private-public operating agreement would limit operation to "as needed" when no events at Dodger Stadium are being held. Therefore, the proposed agreement offers no definitive access to the park beyond scheduled Dodger Stadium events.

Because there is no guarantee that the gondola will run on days when no events are held at the stadium, the SPRC is not likely to and should not approve the amendment. With a combined land and air use of over an acre, the SPRC would be giving up a sizeable piece of the Historic Park's property to the project

Response GO16-17 Refer to Response S2-2 regarding the Chinatown/ State Park Station and proposed Project alignment within the Park. The Chinatown/ State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would overhang 9,320 square feet of the park (including the 2,195-square-foot footprint). The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park (~1.4 million square feet), plus an Additional Separation Buffer. While the Chinatown/ State Park Station's footprint will occupy 2,195 square feet within the park, through continued collaboration with State Parks, which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park

[23] See City of Los Angeles. 2023. Commission, El Pueblo de Los Angeles Historical Monument. Available at: https://elpueblo.lacity.gov/commission. Accessed July 2023. See also, California Department of Parks and Recreation. 2023. California State Parks Listing. Available at: https://www.parks.ca.gov/?page_id=21805. Accessed July 2023 (El Pueblo de Los Angeles is not included on this list).

such that it would add to, rather than take away from the park's purpose and objectives.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment and the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment GO16-18 To reiterate, claims stating the LA ART Project will provide critical public access (thus allowing the construction of towers and a station within the park and on park lands) is not substantiated within the Draft EIR. Detailed analysis is not provided that states a clear or reliable level of service (Draft EIR states "based on demand" and "as needed") that will be provided in the future vs. only on game or special event days. The Draft EIR suggests limited access from a privately funded and operated LLC warrants the removal of public park lands. The Conservancy disagrees, and would like to see greater documentation and evidence provided to the public that can support the Draft EIRs conclusions on this issue.

Response GO16-18 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events

at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR.[24] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO16-19 IV. Should the proposed project anticipate federal funding, Section 106 and Section 4(f) would be triggered and additional environmental review would be required

The Conservancy would appreciate greater clarity regarding the funding of this project. Particularly, if any federal dollars will be used in any way for LA ART's planning, development or construction. Should the applicant or lead agency access funding from these entities, the project would trigger Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the Department of Transportation Act. Generally federal environmental review occurs in tandem with CEQA reviews.

Section 106 of the NHPA requires federal agencies to consider the impact of their actions on historic resources. Because of this section, public agencies must assume responsibility for the consequences of their actions on historic resources and be publicly accountable for their decisions.

[24] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Furthermore, Section 4(f) states:

> "The Secretary shall not approve any program or project which requires the use of any land from a public park, recreation area, wildlife and waterfowl refuge, or historic site unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use."

Given the projected ridership, size of the station platforms, extension into the Union Station parking lot, and use of Los Angeles State Historic Park property for the Chinatown/State Park Station, it is foreseeable that additional government funds and those at the federal level will be accessed. Additionally, the Union Station forecourt and esplanade project, located in the same vicinity as the Alameda Station, had previously been granted federal funding for the future project. Should that funding contribute to the pedestrian plazas for the station in any way, it would trigger the above code sections and need for federal environmental review.

Response GO16-19 This comment provides a general recitation and characterization of federal law. As proposed, the proposed Project does not require Federal review, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment GO16-20 V. Transfer CEQA lead agency authority to the City of Los Angeles

The LA Conservancy believes the City of Los Angeles is better suited to serve as the Project's lead agency. As planned, the City of Los Angeles would be responsible for granting the majority of the Project's discretionary and ministerial permits and therefore is better suited for the lead agency role.

As shown in the Draft EIR, the 1.2-mile-long Project is to be built and operated predominately on or above the City's public rights-of-way. Furthermore, the plan states that the private LLC developer would enter into a public-private operating agreement with the City of Los Angeles.

Given the numerous historic resources in the area, the City of Los Angeles is better equipped to evaluate impacts and conflicts, including those on historic resources for which is assigned the primary jurisdiction, such as El Pueblo and various Historic-Cultural Monuments (HCM). As previously stated, the historic resources within the

project area are some of the oldest and most important within the City. Therefore, a lead agency with this experience is more appropriate.

Response GO16-20 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro is the proper lead agency for the proposed Project. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with consideration of written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. While the City, along with other responsible agencies, has discretionary approval authority over some required permits and approvals for the proposed Project, Metro has discretionary authority to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project. (Public Utilities Code § 130252.) This power, vested by the State Legislature, is considerably more broad than individual land use and other review and approvals to be issued by responsible agencies for the components of the proposed Project occurring within their respective jurisdictions. The City and other responsible agencies that still retain approval authority over the aspects of the proposed Project within their jurisdiction are properly designated as responsible agencies engaged in the consultation process with Metro.

As demonstrated in Section 3.05, Cultural Resources and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR, the Draft EIR thoroughly reviews the potential impacts to historical resources. Refer to Section 8.0, List of Preparers, of the Draft EIR, for a list of the subject-matter experts for Historic Resources who assisted in preparation of the Draft EIR, including Teresa Grimes from Historic Preservation, and Amanda Duane from GPA Consulting, who have extensive experience evaluating historic resources in the City of Los Angeles. In addition, Ken Bernstein and Lambert Giessinger with the City's Department of Planning, Office of Historic Resources, were consulted in preparation of the Draft EIR. These subject-matter experts who assisted Metro in preparing these assessments for the Draft EIR have access to all of the same databases and informational resources as the City would, including National Register of Historic

Places, the California Register of Historic Resources, California Historical Landmarks, California Points of Interest, the California Historical Resources Inventory System (CHRIS), the South Central Coastal Information Center (SCCIC), the Los Angeles Historic-Cultural Monuments, SurveyLA, and Sanborn Fire Insurance Maps, and thus the same information is available to Metro as it is to the City or another agency.

Comment GO16-21 VI. Conclusion

The Conservancy has serious concerns regarding the construction and operation of the proposed LA ART project. To state again, we raise the following concerns regarding the Draft EIR and the proposed Project:

I. Purpose and need for LA ART is not fully demonstrated when environmentally superior alternatives are identified and available to be implemented

Response GO16-21 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in responses GO16-2 through GO16-20.

Comment GO16-22 II. Historic and cultural resources and view sheds will be impacted and irreparably harmed by the LA ART Project

Response GO16-22 Refer to Responses GO16-9 through GO16-14 for discussion of how potential impacts related to historical resources would be less than significant.

Comment GO16-23 III. Draft EIR does not adequately address the proposed use and transfer of Public rights-of-way and lands and their permitted legal use, and is in conflict with Public Resources Code 5019.59

Response GO16-23 Refer to Responses GO16-15 through GO16-18 for a discussion of the Los Angeles State Historic Park General Plan Amendment and the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO16-24 IV. Should the proposed project anticipate federal funding, Section 106 and Section 4(f) would be triggered and additional environmental review would be required

Response GO16-24 Refer to Responses GO16-3 and GO16-19 for a discussion related to funding for the proposed Project and Federal review. As proposed, the proposed Project does not require Federal review, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act.

Comment GO16-25 V. Transfer CEQA lead agency authority to the City of Los Angeles

Response GO16-25 Refer to Responses GO16-2 and GO16-20 for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency.

Comment GO16-26 About the Los Angeles Conservancy:

> The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.
>
> Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.
>
> Sincerely,
>
> Adrian Scott Fine
> Senior Director of Advocacy
> cc: Supervisor Hilda L Solis
> Office of Mayor Karen Bass
> Council District 1, Eunisses Hernandez
> City of Los Angeles, Department of City Planning, Office of Historic Resources

Response GO16-26 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments are contained in this letter provided above in Responses GO16-2 through GO16-25.

Comment Letter GO17 – The California Endowment, Chatten-Brown, Carstens & Minteer LLP

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO17

Comment GO17-1 On behalf of The California Endowment ("TCE"), we submit the following comments on the Draft Environmental Impact Report ("DEIR") prepared for the project ("Project") proposed by Los Angeles Aerial Rapid Transit ("ARTT").

Summary and Statement of Position.

We provide the following summary of our position, followed by a table of contents and the remainder of our letter.

Response GO17-1 This comment provides a general introduction to the comments raised in this letter. Responses to comments contained in this letter are provided below in Responses GO17-2 through GO17-153.

Comment GO17-2 Introduction & Overview: We oppose the Project and request that it be terminated immediately.

Metro should not be supporting this unsolicited private project proposed at the behest of Frank McCourt and his companies because it is not a public transportation project, but rather, a common carrier tourist attraction. Because it is a private carrier for private benefit which Metro will not own, operate, or control, this private project should not benefit from public land, air rights, or taxpayer resources—all of which will be necessary for this estimated $300 million behemoth to become a reality. As the DEIR itself acknowledges there is a superior way to achieve the outcomes allegedly sought by this proposed project that involves public transportation—electric buses. If the Project is to be pursued, Metro should not be the lead agency - because the City of Los Angeles ("City") is in a much better position and is more properly designated as the lead agency.

Response GO17-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Cost and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed

Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency.

Comment GO17-3 The DEIR is Deficient and Must be Revised and Recirculated: The DEIR is seriously deficient. It fails to fulfill its function of informing both the public and the decision makers of the impacts of the Project, potentially feasible mitigation measures, and alternatives to the Project. As a result, it cannot provide the basis for reasoned decision-making as required by the California Environmental Quality Act ("CEQA").

If it is pursued further, the DEIR must be corrected and recirculated. An EIR is not supposed to be a sales brochure or advertisement for a project. It is supposed to be an unbiased full disclosure document that advises the public and decision makers of the impacts of a project and how any negative impacts can and will be reduced. The DEIR presented by ARTT and Metro falls woefully short of those legal requirements for full and accurate disclosure.

Response GO17-3 This comment provides a general introduction and summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO17-4 through GO17-153. This comment and the comments in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO17-4 The DEIR is Misleading: Sadly, omission of critical information and use of analytically misleading half-truths is a common theme throughout the EIR. Mitigation measures for the Project's negative impacts are ineffective and explicitly deferred. It remains unclear what any unspecified future mitigation measures will entail, but the certainty and effectiveness of any proposed mitigations remain in question because the project proponent has not committed to funding any portion of the project other than initial environmental review and permitting.

Response GO17-4 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO17-5 through GO17-153. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation and how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment GO17-5 The Financing Plan is Missing: To date, the Project does not have a financing plan, a plan that is critical to understanding how negative impacts identified in the DEIR will be mitigated by the Project's proponent, if they will be mitigated at all.[1] The Project's financial plan- which the Metro board was promised would be made available before the end of September 2022- is missing altogether. Since the proponent- Frank McCourt's company, ARTT/ McCourt Global- has only committed to funding about 3% of the entire project budget, the shortfalls in construction and operating revenues will need to be made up somewhere and it is most likely that some if not all will come from public transit funding sources- better used for public projects. The DEIR should have discussed who is responsible for the Project, its implementation, and its mitigation measures both in the short range and the long-range terms. We could discern no mention of Climate Resolve or ZET in the EIR at all. In this way, the EIR fails as a full disclosure document.

Footnote 1: Newspaper accounts reported that the gondola project was transferred to a newly-created entity named Zero Emissions Transit (ZET), which is apparently a subsidiary of Climate Resolve. However, in court documents, Metro representatives stated under perjury that the transfer had not yet occurred, and was just a non-binding statement of future intention. (Declaration Of Ronald W. Stamm In Support Of Respondent's And Real Party's Joint Opposition To Motion To Augment The Record And File A First Amended Petition in Los Angeles Superior Court case no. 22STCP01030, filed October 6, 2022, paragraph 10.)

Response GO17-5 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail

as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project, and operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment GO17-6 Unavoidable Impacts Cannot be Mitigated: Mitigation of identified negative impacts will be expensive but are critical to protect the neighborhoods and people living and working near the Project route. Traffic, air pollution, parking, noise and recreation will all have a significant impact on the local community and historic nearby landmarks. The Noise section of the DEIR identifies that there will be significant and so-called unavoidable impacts from construction equipment. This noise and vibration will affect the neighborhoods around El Pueblo and in Chinatown. The vibration will threaten the physical integrity of the El Grito Mural and the Avila Adobe. TCE offices, which are less than 100 feet from the proposed site of the Alameda tower support over 400 office workers which in addition to TCE staff include over 11 non-profit orgs in addition to another dozen groups in various stages of incubation and their staff members, as well as hundreds of non-profit and governmental visitors who participate in conferences on site on a daily basis. Homeboy Industries is also a sensitive receptor in this area and would be similarly impacts by noise and vibration. These impacts can be avoided by denying the project altogether, or choosing the environmentally superior alternative, which in the EIR is called "Transportation Systems Management" but comes down to enhancement of the Dodger Express Buses system.

Response GO17-6 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. Per Section 15092 of the CEQA Guidelines, a public agency may decide to approve or carry out a project for which an EIR was prepared if it has determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a

proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As stated on page ES-17, in the Executive Summary, of the Draft EIR, the proposed Project would not result in any significant and unavoidable operational impacts. Refer to Responses GO17-124 through GO17-130 for a discussion of the construction and operational noise and vibration impacts from the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose.

Comment GO17-7 Instead of promoting a private gondola to a private sports stadium (an amusement park ride, not actual public transit), Metro should focus on enhancing actual public transit options with its limited resources and staff and Board time.

Response GO17-7 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, as discussed in Topical Response C, Project Features, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The

Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO17-8 The City of Los Angeles is the Appropriate Lead Agency: Because the Project is a private project and not a public transportation project, we ask that the Project review process be terminated immediately. In the alternative, Metro should transfer lead agency status to the City to complete review and processing of the gondola Project. Because decisions about this development will have profound impacts on the City and the future the quality of life of City residents, the City, not Metro, is the proper lead agency.

Response GO17-8 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. While the City, along with other responsible agencies, has discretionary approval authority over some required permits and approvals for the proposed Project, Metro has discretionary authority to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project. (Public Utilities Code § 130252.) This power, vested by the State Legislature, is considerably more broad than individual land use and other review and approvals to be issued by responsible agencies for the components of the Project occurring within their respective jurisdictions. Metro has "principal authority" over the design, construction, and implementation of the proposed Project and is the appropriate lead agency.

Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, the

proposed Project requires approvals from the City. Refer to Response G017-11 for further discussion of discretionary approvals required for the proposed Project, including from responsible agencies. CEQA does not require a lead agency to have jurisdiction over all areas where a proposed Project may result in environmental impacts. (Pub. Resources Code, § 21067; CEQA Guidelines, § 15367.) The City and other responsible agencies that still retain approval authority over the aspects of the proposed Project within their jurisdiction are properly designated as responsible agencies engaged in the consultation process with Metro. The Draft EIR properly considered all potential impacts in the area of the proposed Project, which includes property that is in the jurisdiction of Metro, the City, State Parks, and Caltrans. Metro consulted with all responsible agencies, including the City, regarding potential impacts to their property, in compliance with CEQA. And, under the Mitigation, Monitoring and Reporting Program for the proposed Project, included in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, the City would have certain enforcement authority to ensure mitigation of any potentially significant impacts that would occur on City-owned property and ROW, as the Mitigation Monitoring and Reporting Program for the proposed Project designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures.

Comment GO17-9 As discussed below, some impacts are disclosed by the DEIR as significant and unavoidable (noise and vibration). Still other impacts are reported to be mitigated below the level of significance, but because the impact was understated, or the mitigation measure is uncertain or vague, the impacts will be significant (traffic, local air quality, cultural resources, recreation and parks, and land use). Together, these impacts are unacceptable. Projects proposed through our public entities, whether Metro or the City, should maintain and improve, not degrade, the quality of life in Los Angeles.

Response GO17-9 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures complied with CEQA's requirements. As stated on page ES-17, in the Executive Summary, of the Draft EIR, proposed Project would not result in any significant and unavoidable operational impacts. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project

alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Response GO17-7 for a discussion of the proposed Project need and how the proposed Project would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Refer to Response GO17-6 for a discussion of how the decision-making agency may balance benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. When the lead agency approves a project which will result in the occurrence of significant effects, which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record." This comment otherwise provides a general summary of comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO17-11 through GO17-152.

Comment GO17-10 Conclusion: Outright denial of this Project is appropriate in view of the numerous significant, unavoidable environmental impacts of the Project and the existence of a superior, emission free, less costly and less community impactful method of achieving the stated goal of this project.

Response GO17-10 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general summary regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO17-2 through GO17-9 and below in GO17-11 through GO17-153. Refer to Table 2 in the Executive Summary of the Draft EIR for a summary of the proposed Project's environmental impacts. As stated on page ES-17, in the Executive Summary, of the Draft EIR, the proposed Project would have significant construction noise and vibration (human annoyance) impacts, and the proposed Project would not result in any significant and unavoidable operational impacts. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA.

Comment GO17-11 Denial of the Project is also appropriate because Metro has no ability to approve this project because it is wholly private- not a public-private project or other type of project that may be approved by Metro for joint development with ARTT. Instead of reviewing the Project as lead agency, Metro should transfer lead agency status to the City of Los Angeles, which is required to approve a greater number of Project related actions and has a greater ability to monitor and control Project implementation in the future if it is implemented.

Response GO17-11 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response GO17-8 for a discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. Further, as discussed in Section 2.0, Project Description, the proposed Project requires approvals from the City. CEQA does not require a lead agency to issue the most discretionary approvals in order to serve as lead agency or otherwise take into account the number of discretionary approvals under each agency's ambit. It is "the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term 'project' does not mean each separate governmental approval." (CEQA Guidelines, § 15378(c); *Committee for a Progressive Gilroy, supra*, 192 Cal.App.3d 847, 863.)

Comment GO17-12 The California Endowment's complete DEIR Comment Letter follows. To assist in review of this Comment letter, we provide the following Table of Contents:

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Response GO17-12 This comment provides a table of contents and general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO17-13 through GO17-152.

Comment GO17-13 I. PRELIMINARY STATEMENT AND LEGAL FRAMEWORK: THE GONDOLA PROJECT SHOULD BE REJECTED OUTRIGHT.

A. Preliminary Statement On Gondola Proposal and Processes.

1. Impacts on TCE and the Community.

The Endowment—who will be directly impacted by this Gondola Project and its use of the surrounding land-- seeks to protect the interests of its community, and to ensure that local agencies (like Metro) comply with their own laws. (See Notice of Preparation Letter Submitted by The Endowment and Homeboy in EIR Appendix A.)

TCE's Building Healthy Communities Initiative is focused on empowering local communities to change the conditions, policies and practices that create racial, health

and opportunity disparities in communities.[2] TCE is partnered with fourteen communities across California to engage in place-based community change initiatives to build healthy and safe neighborhoods for children to grow up in. Much of this work is accomplished by creating spaces for collaboration by nonprofit service providers. The Center for Healthy Communities on Alameda is such a space. TCE's Center for Healthy Communities campus has become an anchor pillar of the region's nonprofit community, annually hosting thousands of conference attendees to work on the wellness gaps in our community.5 Every year TCE welcomes over 150,000 guests to its campus. For example, during 2019, the Center for Healthy Communities Campus hosted an average of 8 conferences per day for community stakeholders such as the City of Los Angeles, the County of Los Angeles, and LA Metro. This includes over 500 Grantee conferences, 700 Government conferences, and 800 non-profit conferences annually. At TCE, we strive to continue to expand these programs and are actively planning on adding additional programming space, that will increase our daily visitor count and help to complete the vision of the campus. Completing the TCE campus will foster the development of additional community leadership, civic engagement, and transitional housing support in the community. The California Endowment's Center for Healthy Communities represents opportunities for civic engagement and participation by the nonprofit sector in improving community well-being in the region. Completing the TCE campus is also complementary to the shared vision of a establishing a "Hope Village" for the further advancement of the community.

Footnote 2: The California Endowment https://www.calendow.org/the-center-for-healthy-communities/los-angeles/

Response GO17-13 Metro has and will continue to comply with its obligations under CEQA, as well as all applicable statutes, regulations, and policies. As discussed in Section 3.13, Noise, of the Draft EIR, the proposed Project would have a temporary, significant noise and vibration (human annoyance) impact on The California Endowment during construction activities of the Alameda Tower. The proposed Project would not result in any other significant and unavoidable construction or operational impacts to The California Endowment. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of how consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period, including the comment letters received during this period. The proposed Project is consistent with the Building Healthy Communities Initiative's goal of improving health in underserved communities.[25] As discussed in Topical Response N, Environmental

[25] See The California Endowment. 2010. Building Healthy Communities Initiative. Available at: https://www.buildinghealthycommunities.org/. Accessed August 2023.The Building Healthy Communities Initiative is focused on transforming 14 of California's communities affected by

Justice, the proposed Project has the ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution. The Draft EIR further addresses environmental justice by including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment GO17-14 Over the last several years, The Endowment has reached out to the City to discuss the possibility of using the triangle park immediately adjacent to TCE for the benefit of the community and has regularly supported its maintenance and upkeep. This park and adjacent street were anticipated to be part of the expanded TCE campus envisioned in the Hope Village project. Given the proximity of the Project along Alameda Street to the TCE campus, it would be a significant impediment to completing the campus and expanding these community service uses.

Response GO17-14 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how Alameda Tower would have a footprint of 900 square feet at the northern corner of the Alameda Triangle, a City ROW between Alameda Street North Main Street, and Alhambra Avenue, and the remaining area would continue to be maintained for pedestrian use. As discussed in Topical Response E, the Draft EIR considered proposed development projects in the vicinity of the proposed Project, using public information to the extent it was available. Table 5-1, Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, lists 46 related land use development projects that are either approved or proposed—but still considered—in the Draft EIR's analysis, including certain Restorative Justice Master Plan and Hope Village projects. It would be unduly speculative for the environmental documentation to consider a related project that does not have any publicly available information and has not submitted an application for development. Refer to Section 5.0, Corrections and Additions, of the Final EIR, and Topical Response E for a discussion of how subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023 with additional information regarding the Hope Village, noting that the Alameda Triangle could be used for recreational spaces. The proposed Project would not impair or impact The California Endowment's potential use of the Alameda Triangle for recreational spaces. As noted above, the Alameda Tower would be located on 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic, also provided in Section 5.0, depicts the Alameda

"health inequities into places where all people and neighborhoods thrive." In Los Angeles, these 14 communities include Boyle Heights and South Los Angeles. See The California Endowment. 2023. Building Healthy Communities: A Decade in Review. Available at: https://www.calendow.org/learning/executive-summary. Accessed August 2023. Accordingly, the proposed Project is located outside of the 14 communities that are the focus of the Building Healthy Communities Initiative.

Triangle, including space for both the Alameda Tower and potential recreational spaces:

Further, the proposed Project alignment travels along Alameda Street, and, as shown in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, does not require any aerial rights over the properties that The California Endowment anticipates building its housing or community and health services. Accordingly, the proposed Project would not impede The California Endowment's anticipated housing, community and health services, or recreational spaces.

Comment GO17-15 The Gondola Project would impact historic cultural resources such as the Avila Adobe, Olvera Street, and the State Historic Park with aesthetics and noise associated with its operations and with noise and ground vibration associated with its construction. It will have aesthetic impacts as its towers and stations literally tower over neighborhoods and gondola cars transport hundreds of people past the windows and over the yards of houses. It will have traffic and transportation impacts as game attendees will drive to and park in Chinatown and Union Station neighborhoods in order to board the gondola and save on expensive Dodger parking lots. It will have recreational impacts on the State Historic Park as it takes a portion of the land and prevents use portions of the park for such beloved activities as kite flying during kite festivals.

Response GO17-15 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's

analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant operational noise impacts. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their integration with nearby residential and open space uses.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Impacts to parks and recreational facilities would be less than significant.

Comment GO17-16 2. The Private Use of Public land, Rights of Way and Eminent Domain is Indefensible.

The project would involve use of aerial gondolas to transport individuals from the Forecourt of Union Station, over a public right of way, a metro line, Chinatown, a freeway, and over multiple communities, to Dodger Stadium. It would require the extensive use of public land including Metro's Forecourt and parcels of property

owned by the City of Los Angeles along Alameda Street near Olvera Street, and state-owned property at the State Historic Park of Los Angeles. It would require use of air rights over private property, over State owned highway, and over Metro rail lines, and Los Angeles public streets.

Response GO17-16 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment GO17-17 If private property owners do not agree to allow their property to be used for the Project, Metro might use condemnation proceedings. The use of public power, such as eminent domain by Metro to assist a private carrier is expressly contemplated in correspondence between Metro and ARTT. (AR 199- Sept. 26, 2018, Letter, p. 9 ["…it is anticipated that Metro would utilize the power provided…" including "condemnation"]).

Response GO17-17 The purpose of the Draft EIR is to inform the public and decision makers generally of the significant environmental impacts of the proposed Project. (See CEQA Guidelines §15121(a).) The focus of an EIR is the significant effects on the environment (id., §15143), not on the mechanisms for how property for a proposed project may be acquired. It is speculative at this point whether Metro would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].) If Metro decides to exercise that authority, it will be subject to the statutory processes set forth in California Code of Civil Procedure Sections 1240.10 et seq. Refer to Responses P701-3 and P701-7 for discussions of the use for eminent domain for the proposed Project and Metro's eminent domain authority. Further, the reference to the administrative record in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 is noted, but the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. In addition, this comment mischaracterizes the cited document. The Project Sponsor noted that it intended to "use its best efforts to acquire public right of way and private land and aerial easements," but, if necessary, Metro could use its powers provided under Public Utilities Code sections 180152 or 30600, which includes the ability to acquire property by "grant, purchase, gift, devise, or lease, or by condemnation."

Comment GO17-18

GO17-18A The Surplus Lands Act and similar provisions of law prioritize affordable housing, educational, open space and recreational use of public land above private use.

GO17-18B The Park Preservation Act, California Public Resources Code section 5400-5409, requires that any usage of designated public park land, such as would occur at the State Historic Park, must be compensated for by replacement of equal land. The EIR fails to address the Park Preservation Act.

Response GO17-18

GO17-18A Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of the Surplus Land Act.

GO17-18B Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Public Park Preservation Act.

Comment GO17-19 3. Secretive Sole Source determination should be Voided.

Following ARTT's submission of a proposal in April 2018, Metro made a sole source determination in 2018- that ARTT would be the only possible provider of the gondola- without public disclosure and/or involvement or Metro Board of Directors input or approval. Metro entered a Memorandum of Agreement ("MOA") in 2019 that restricted its ability to examine competitive proposals through an exclusive negotiating agreement ("ENA") clause. Such sole source approval and ENA restrictions were taken in violation of Metro's own stated policies and procedures in its internal acquisition and contracting manuals, which in turn implement state competitive bidding laws. Competitive bidding requirements are normally necessary- and required by law- for all significant public transportation projects.

All of these critical actions in matters of vital public interest, were taken administratively, without public knowledge, oversight and/or involvement—and all in direct violation of Metro's own procurement policies.

If left unchecked, these determinations—which set the course for a major investment of tax-payer funds and direct impacts on the local community, service providers, and property owners (including The Endowment)—will proceed to the entitlement/construction phase.

Response GO17-19 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate). The commenter's appeal in this lawsuit was abandoned on May 26, 2023, and accordingly the Los Angeles Superior Court's decision is final. Refer to Response GO17-2 for a discussion of the proposed Project's funding. Refer to Response GO17-13 for a discussion of potential impacts to The California Endowment.

Comment GO17-20 4. Sweetheart deal through Metro's Office of Extraordinary Innovation (OEI).

While some members of the public may have heard about the Gondola Project in December 2019, Metro's sole source determination through the Office of Extraordinary Innovation ("OEI") was not disclosed to the public. The Endowment itself was unaware of its existence until September 2021 and only after The Endowment and other organizations sought records regarding the Gondola Project. The Gondola Project, therefore, appears to have all the earmarks of a clandestine, sweetheart deal, carefully sidestepping the significant public engagement, outreach and transparency required of all Metro public transportation projects

It simultaneously avoids the scrutiny and competitive bidding required of private projects. By fast-tracking and sole-sourcing a multi-million-dollar aerial tram through Metro's OEI Metro deprived the public of knowledge and input regarding the Gondola Project as it proceeded through Metro's internal review process. OEI was meant for smaller, more genuinely innovative projects- not a gondola which is not extraordinary or innovative technology in any way.

Response GO17-20 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate).

Metro followed the prescribed process for unsolicited proposals to the Metro Office of Extraordinary Innovation ("OEI"), which involved several public meetings where the proposed Project was discussed in an open forum and otherwise made public on Metro's website. On April 25, 2018, the Project Sponsor submitted its Unsolicited Proposal to OEI. At the April 26, 2018 Metro Board of Directors meeting, the then-Metro CEO and the Chair of Metro's Board spoke about the proposed Project during their respective reports. Metro issued a press release on this date, noting that Metro had received the proposal and would evaluate the proposal under its Phase I analysis process "within 60 days of being received" in accordance with the Unsolicited Proposal policy process, prior to then choosing whether or not to advance the proposal to the more-detailed Phase II consideration. ("Metro receives Unsolicited Proposal for aerial rapid transit between Union Station and Dodger Stadium," Metro – The Source (April 26, 2018).)[26]

Following its consideration of the proposal consistent with the OEI process, Metro sent a letter to the Project Sponsor on October 11, 2018, confirming that the proposed Project would proceed to a sole source agreement, noting that Metro was prepared to enter into exclusive negotiations on the proposed Project. Metro's December 3, 2018 Board Box included a discussion of the OEI process, noting that the Project Sponsor met the sole source criteria and, that during the Phase I review, Metro "felt that this zero-emission mode could provide a useful, creative and fun

[26] Hymon, Steve. 2018. Metro receives Unsolicited Proposal for aerial rapid transit between Union Station and Dodger Stadium. Available at: https://thesource.metro.net/2018/04/26/metro-receives-unsolicited-proposal-for-aerial-rapid-transit-between-union-station-and-dodger-stadium/. Accessed August 2023.

means of accessing Dodger Stadium and Elysian Park while reducing congestion and improving air quality in the neighborhoods surrounding the Stadium" and "conducted due diligence on the feasibility of this unique partnership and assessed the costs and benefits to Metro and the public of partnering on the project." (December 3, 2018 Board Box Update, p. 2.)

At the December 6, 2018 Metro Board of Directors meeting, the then-Metro CEO and Chair provided the Metro Board with an update on the proposed Project in his CEO Report to the Board, noting that he had "signed a memo closing out the unsolicited proposal process for the Los Angeles Aerial Rapid Transit Project and advancing that project to the implementation phase" and that Metro would "continue to develop the project by entering into an exclusive negotiation with our partner, the Aerial Rapid Transit Technologies LLC."[27] On this same day, Metro issued a press release announcing that Metro and LA ART had signed a letter of intent to "formally begin the negotiations necessary" for the Project and that the letter of intent "signals Metro's interest in implementing the project and moves it from the Unsolicited Proposals evaluation stage to project development." (See "Metro and ARTT co-sign Letter of Intent to begin negotiations on developing gondola to Dodger Stadium," Metro – The Source (December 6, 2018).) Metro formally concluded the Unsolicited Proposal process on December 14, 2018, determining that the proposal satisfied the Phase II criteria, and advanced the proposal to the implementation process.

Contrary to this comment's contentions that Metro did not publicly discuss the sole source determination, as stated above, the then-Metro CEO and Chair provided the Metro Board with an update on the Project on December 6, 2018 at the public Board of Directors meeting, noting that Metro was "entering into an exclusive negotiation" with LA ART. Metro's December 3, 2018 Board Box included a discussion of the OEI process, noting that "after reviewing the Phase II proposal submitted," the Metro "review team recommended moving forward to implementation by entering into exclusive negotiations." Metro's Unsolicited Proposal Policy FAQs recognizes that "Metro Board meetings are matters of public record," (Unsolicited Proposal Policy FAQs, p. 4) and this extends to items provided within Metro's Board Box. In addition, at the publicly-noticed April 18, 2019 Metro Executive Management Committee ("EMC") meeting and the April 25, 2019 Metro Board meeting, Metro received and filed a status report on the proposed Project that outlined the steps for moving forward with the proposed Project, including continuing negotiations on the Memorandum of Agreement ("MOA") between the Project Sponsor and Metro, and the CEQA process. The reports for these meetings outlined the MOA's terms, including that Metro will act as lead agency for the Project under CEQA. The reports also affirmatively acknowledge Metro's sole source determination, stating that in

[27] See Los Angeles County Metropolitan Transportation Authority (LA Metro). 2018. Regular Board Meeting Agenda Item 4. Available at: https://metro.granicus.com/player/clip/987?view_id=2&redirect=true&h=7b1d4fe0fe92c06e7a30b6c30ed61f65. Accessed August 2023.

2018, "Metro formally concluded the unsolicited proposal process and began exclusive negotiations with ARTT."

The proposed Project was also discussed at the publicly noticed Metro EMC and Board meetings on September 17, 2020, September 24, 2020, June 17, 2021, and June 24, 2021.

Metro's consideration of the proposed Project did not occur solely behind closed doors. Further, as part of early outreach to organizations along the alignment, the Project Sponsor met with The California Endowment early in the process following Metro's determination that the proposed Project had satisfied the requirements of its Unsolicited Proposals policy to allow the proposed Project to proceed to the environmental review phase for further analysis. The Project Sponsor and The California Endowment had a Zoom meeting on April 22, 2020. Following the NOP's release, the Project Sponsor reached out to The California Endowment to provide updates and discuss potential opportunities to collaborate. The Project Sponsor had a meeting scheduled with The California Endowment on November 13, 2020, but the meeting was canceled the night before with a note stating that "we don't believe that a meeting is needed." Accordingly, this statement that The California Endowment was unaware of the proposed Project until September 2021, is simply false.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar.

Comment GO17-21 5. Frank McCourt's Interest Would Be Improperly Promoted Above Everyone Else.

This project would promote the interests of a single person- Frank McCourt- over the interests of the public, which would be better served by a genuine public transportation project. Gondola Project is proposed by ARTT. ARTT was created by

McCourt Global which is, in turn, controlled by Frank McCourt, the former owner of the Los Angeles Dodgers before their bankruptcy filing. McCourt continues to hold at least a half- interest in the parking lots surrounding Dodger Stadium. In 2008, he proposed extensive commercial and retail development of the parking lots in a plan called the Next 50, but those plans went nowhere when he was unable to raise the financing for them. The plans are apparent on the website of the architect who designed them for the McCourt Company. (See https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/; Enclosure 10.)

TCE has taken a stand on behalf of the broader public interest, and the interests of the local community, to ensure that community voices are heard, and that if true public transportation is needed, that Metro adhere to its own policies that seek to develop transportation with and for the public, not simply push forward an unsolicited private transportation project through a now faulty Metro process in the Office of Extraordinary Innovation.

Response GO17-21 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response GO17-20 for a discussion of how the Los Angeles County Superior Court upheld Metro's OEI process with respect to the proposed Project. Refer to Response GO17-7 for a discussion of the need for the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of the Next 50 Project, including how the project did not proceed after 2008, and the current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. While the contents of Enclosure 10 were considered in this response, mere statements on a website are not evidence that such development is currently proposed.

Comment GO17-22 6. An environmentally superior alternative of Electrified buses is available and should be chosen.

A better, public serving transportation project might be, for example, enhancement of the Dodger Express buses with electrified buses. This possibility is identified as the Environmentally Superior Alternative in the EIR. (4-75.) Such electric buses would be available not just during the 182 days on which there is a game or event at Dodger stadium, but also available to serve the public on other days and to other destinations throughout the rest of the year. McCourt's private gondola project line serves no other interest than conveying Dodger game ticketholders to the Stadium from Union Station and back again. This will not alleviate but will exacerbate greater traffic, pollution and congestion in the community in an around Union Station (UCLA Study)

as riders drive to Union Station to take the Gondola, thereby displacing cars from the Dodger parking lot to Chinatown and the surrounding area around Homeboy and The California Endowment.

Response GO17-22 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, of this Final EIR and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative ("TSM") for an enhanced Dodger Stadium Express. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Refer to Topical Response O, Response to UCLA Mobility Lab Study. Refer to Topical Response C, Project Features for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Refer to Response GO17-7 for a discussion of the need for the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors, including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents,

workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment GO17-23 7. Precedent set by gondola would be bad public policy of Private Interest Appropriation of Public Functions.

If Metro continues to participate in this gondola proposal with Frank McCourt and the companies he controls, it will undercut public confidence in Metro and in local government generally. The gondola project demonstrates that a single rich and powerful individual such as Frank McCourt can coopt the instruments of public government- and an agency as large as Metro- that is supposed to serve the public generally- and enlist that agency in meeting his private interests of building a private transportation project to the parking lots he owns at Dodger stadium.[3]

Footnote 3: Even if the Project allegedly will not require Metro monetary expenditures, Metro itself identified opportunity costs and other costs in its Request for Information. Metro stated that the Project would "have a cost to Metro and the people of Los Angeles County. These may include the social and political cost of acquiring property; the impacts of construction on local communities; acting as the face of the project and mediating opposition; the opportunity costs of expending limited resources and capacity; and the impact of allowing for an additional transit use on the Union Station property given the myriad of projects, both transit and

commercial, in early stages of development. To the extent that Metro will be environmentally clearing the project, claiming property, and substantially involved in other ways, the reputational risks of problems that arise on the project, such as delays, mismanagement, or operational incidents, also reflect on Metro even if Metro is not paying for the project." (Request for Information, p. 3.)

Response GO17-23 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. The reference to the administrative record in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 is noted, but because the cited document is unrelated to the substance of the Draft EIR, no further response is warranted.

Comment GO17-24 Metro has committed to use eminent domain—the taking of private land and air rights away from individual owners-- to help him achieve his goal. The former homeowners of Chavez Ravine had their homes and land taken by eminent domain. Will history repeat itself? If McCourt and the gondola project are not stopped now, it would set a precedent for further use of public agencies by private individuals to serve their private interests and enrich themselves at the expense of the public.

Response GO17-24 It is speculative at this point whether Metro would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].) If Metro decides to exercise that authority, it will be subject to the statutory processes set forth in California Code of Civil Procedure Sections 1240.10 et seq. Refer to Responses P701-3 and P701-7 for discussions of the use for eminent domain for the proposed Project and Metro's eminent domain authority. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting

zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO17-25 This project has been recognized by Metro staff as unprecedented. It is unprecedented for a reason: it is not legally authorized and is not within Metro's jurisdiction to pursue. Billionaire Elon Musk sought to promote similar private transportation to Dodger Stadium in the guise of a public transportation project but he abandoned that effort. (https://ballparkdigest.com/2021/04/16/musk-boring-to-dodger-stadium-dead/). Similarly, the ARTT project should be rejected and abandoned before it progresses further with Metro.

Response GO17-25 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro is the proper lead agency for the proposed Project. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) As discussed in Topical Response A, SB 44, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Thus, Metro is legally authorized under state law to approve the proposed Project. For the proposed Project, pursuant to its authority under Public Utilities Code section 130252, Metro is tasked with considering approval of all plans for design, construction, and implementation, , as well as with consideration of the written approvals to operate the proposed Project. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project.

Comment GO17-26 8. Alternative Use of the Union Station Forecourt.

The proposal assumes the Union Station Forecourt would be used for the gondola project. There are much better uses possible for this public land, including continued use as public open space. If the land is available for lease, members of the public may be interested in exploring its use as supportive housing, community recreational, or educational space. The Surplus Land Act requires a prioritization of uses ahead of private interest.

If there is to be a lease of the Forecourt land, we would like notification of any Requests for Proposals or other bidding processes whether required by local, state and federal competitive bidding laws and regulations or otherwise.

Response GO17-26 As discussed in Section 2.0, Project Description, of the Draft EIR, Metro's LAUS Forecourt and Esplanade Improvements Project is currently being developed in coordination with the City of Los Angeles and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. The proposed Project would be compatible with Metro's LAUS Forecourt and Esplanade Improvements Project, which is also included in Table 5-1, Related Projects, of Section 5.0, Other CEQA Considerations, of the Draft EIR. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of the Surplus Land Act. As discussed on page 2-23 in Section 2.0, Project Description of the Draft EIR, the proposed Alameda Station would be located adjacent to the planned LAUS Forecourt. The Alameda Station would be located over Alameda Street and would provide vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access from the planned LAUS Forecourt.

Comment GO17-27 9. SB 44 Streamlining Does not Apply Because the Gondola is not a Public Transit Project. (EIR Section 1.4.3.)

The DEIR contains a section asserting that SB 44 applies to the gondola project. (EIR, pp. 1-5 to 1.9). However, this is wrong and misinforms the public. As explained below and in TCE's lawsuit and confirmed in ARTT's application, the gondola project is not public transportation; it is a private project. As such, it is not entitled to the streamlining benefits that SB 44 provides for "public transit" projects.

The hearings held in an attempt to comply with SB 44 were not true public hearings, at which members of the public could make remarks in a public forum. Instead, they were in "science fair" format that isolated commenters and caused many members of the public to object in frustration.

(https://www.sgvtribune.com/2023/01/14/opponents-of-aerial-gondola-to-dodger-stadium-take-over-meeting-in-chinatown/.)

Response GO17-27 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Metro held all required public meetings for SB 44, exceeding SB 44's requirements by hosting two informational workshops and four public hearings, including the fourth public hearing held as a continuation of the third public hearing to allow an additional opportunity for attendees to provide verbal testimony due to disruptions at the third public hearing. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the

proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four Public Hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Moreover, the format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the Ticket Concourse, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the Virtual Public Hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review during the Informational Workshop. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusions. Appendix R, SB 44, of the Draft EIR, provides the text of SB 44 (Public Resources Code § 21168.6.9), which provides under Section 21168.6.9(e)(3) that the "lead agency shall conduct an informational workshop to inform the public of the key analyses and conclusions of [the Draft EIR]" within 10 calendar days after the release of the draft environmental impact report, and, Section 21168.6.9(e)(4) requires that the lead agency "shall hold

a public hearing to receive testimony on the draft environmental impact report." SB 44 does not contain further requirements for the content of informational workshops or public hearings. The public meetings during the Draft EIR public review period complied with SB 44.

Comment GO17-28 10. The EIR Must Address Environmental Justice Impacts Including Possible Affirmative Actions to Redress Past Discrimination.

An EIR must analyze the environmental justice impacts of a project proposal. (Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467, 555.) In Golden Door Properties, the trial court ruled that an EIR "failed to address environmental justice" by making "no attempt to disclose the increased health damage that could occur to the more vulnerable County residents (children, the ill, and disadvantaged communities) from the project 'increasing nonattainment criteria pollutants' ..., or from not requiring GHG offsets to be obtained in-County." Similarly in the present case, the significant effects such as from construction noise and vibration (EIR, 3.13-63) will be felt most forcefully and most immediately by the nearby vulnerable communities, including many elderly non-English-speaking residents of Chinatown.

Response GO17-28 Refer to Response GO17-73 for a discussion of how the Draft EIR's air quality and health risk analyses considered the impacts to all receptors surrounding the proposed Project, including sensitive receptors such as children, the sick, and the elderly within a quarter mile of the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The California Attorney General recognizes that compliance with CEQA is a tool to promote environmental justice, and the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. The Draft EIR also analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and the proposed Project is consistent with General Plan policies related to environmental justice, including reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities, facilitating multi-modal access to and from the stations with pedestrian network

improvements. Further, the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would also operate daily in addition to Dodger games and events. Public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise and vibration impacts from the proposed Project. On-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. Off-site construction traffic noise impacts would be less than significant during all phases of construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and *El Grito* Mural, would be less than significant. As demonstrated in Table 3.13-28 on page 3.13-62 of Section 3.13, Noise, of the Draft EIR, the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project. Refer to Response GO17-129 and Response GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. Noise standards, which are generally stated based on the use function of the property and not by age group, are nonetheless developed to protect sensitive populations, including seniors and children.

Comment GO17-29 The Court of Appeal in Golden Door cited Ramo, Environmental Justice as an Essential Tool in Environmental Review Statutes: A New Look at Federal Policies and Civil Rights Protections and California's Recent Initiatives (2013) 19 Hastings W.Nw. J. Envtl. L. & Pol'y 41, 42 [noting that "[t]he California Attorney General's recent litigation involving ... global warming emissions[ ] affecting minority communities has sparked renewed interest in the relationship between environmental review laws and the doctrine of environmental justice."].)

When the City of Los Angeles analyzed expansion of the Los Angeles International Airport, the EIR/EIS included an entire section devoted to environmental justice impacts. (https://www.lawa.org/-/media/lawa-web/lawa-our-lax/final-environmental-impact-statement/final-environmental-impact-statement--part-i/feis_eir_part1-13_040403_environmentaljustice.ashx.) Metro should do no less with regard to the gondola project.

Response GO17-29 Refer to Response GO17-28 for discussion of how the Draft EIR addresses environmental justice. The referenced EIR/EIS was drafted to comply with both CEQA and the National Environmental Policy Act (NEPA). NEPA requires the consideration of environmental justice pursuant to Executive Order 12898. The California Attorney General recognizes that compliance with CEQA is a tool to promote environmental justice, and the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities.

Comment GO17-30 A legacy of discriminatory actions by government officials against minority communities was evident in the forceful eviction of people from their homes in Chavez Ravine in the 1950's in order to make room for Dodger Stadium and its parking lots. Every action Metro and the City of Los Angeles takes today must be informed by efforts to be especially sensitive to the City's diverse communities, especially in light of the discrimination of the past.

Response GO17-30 Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine. Refer to Response GO17-28 for discussion of how the Draft EIR addresses environmental justice. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project supports Metro's goal of prioritizing equity opportunities, and helps promote public transit as an essential lever in enabling access and improving quality of life for Los Angeles County.

Comment GO17-31 Translating documents into appropriate languages, especially when they discuss possible physical damage to treasures of Hispanic heritage in Los Angeles such as Avila Adobe and El Grito Mural, is a bare minimal step that Metro should undertake.

Response GO17-31 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach immediately preceding and during the Draft EIR public review period, which included outreach materials and print advertisements in English, Spanish, Chinese (Simplified), and Chinese (Traditional), and interpretation at the eight public meetings in Spanish, Mandarin, and Cantonese, with interpretation also provided in Taishanese during the final two public meetings. The Executive Summary of the Draft EIR was also translated to Spanish, Chinese (Traditional), and Chinese (Simplified). Refer also to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in four different languages, to reflect the surrounding community, and provided

opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period, which included outreach materials in English, Spanish, and Chinese (Simplified), and interpretation in Spanish and Cantonese.

Comment GO17-32 A legacy of discriminatory actions by government officials against minority communities was also evident in the eviction of residents from ancient Chinatown near Union Station. (Encl. 4 [Administrative Civil Rights Complaint regarding Cornfields, p. 14 stating "The City and the railroads forcibly relocated the Chinatown community to its present location to build Union Station in the 1930's."; also https://californiahistoricalsociety.org/blog/old-chinatown-and-the-present-union-station-transportation-land-use-race-and-class-in-pre-wwii-los-angeles/.)

The injustice families suffered in the 1950's era eminent domain seizures of their homes and property by local government has been extensively documented. (See https://www.latimes.com/entertainment-arts/books/story/2020-03-31/dodgers-stealing-home-eric-nusbaum; https://www.zinnedproject.org/materials/chavez-ravine; https://laist.com/news/la-history/dodger-stadium-chavez-ravine-battle; copies of these articles are enclosed. Encl. 3.)

Response GO17-32 Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

Comment GO17-33 The use of eminent domain[4] to take private property from minority community members in a way that enhances private gain is similar to the historic injustice that occurred at Bruce's Beach in Manhattan Beach. With regard to Bruce's Beach, however, the County of Los Angeles has sought to correct the historic wrong that occurred by returning property to the Bruce family.

(https://mitchell.lacounty.gov/los-angeles-county-completes-landmark-return-of-bruces-beach-to-the-rightful-heirs-of-charles-and-willa-bruce/.) The wrongs done to families who lost their homes and properties through discriminatory government actions in Chavez Ravine have yet to be redressed.

Footnote 4: The use of eminent domain/condemnation power by Metro to assist the gondola is expressly contemplated in the correspondence between Metro and ARTT.

Response GO17-33 Refer to Response GO17-24 and Responses P701-3 and P701-7 for discussions of the use for eminent domain for the proposed Project and Metro's eminent domain

authority. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine.

Comment GO17-34 11. Elected Officials' Clearly Expressed Concerns Must Be Seriously Considered.

On September 15, 2022, the Metro Executive Committee met to receive a staff report on the status of the Gondola project. At this hearing, Los Angeles City Councilmember Hernandez who took office on December 12, 2022, reiterated concerns previously expressed at the September 15, 2022, Executive Committee hearing which were to ensure the genuine involvement of the community in a public and transparent review process for the gondola. Among her requests were for translation of relevant documents.

Additionally, Director Solis raised a number of questions and concerns at the September 15, 2022, Metro Executive Committee hearing. We have provided a transcript of the remarks of Director Solis and of Councilmember Hernandez. (Enclosure 1.)

Finally, the Board of Directors of Metro itself passed a Resolution in 2021 seeking answers to questions to avoid Unintended Consequences. A copy of that resolution is attached. (Enclosure 2.) Despite the passage of time, the Board's questions have not completely been addressed.

Response GO17-34 Refer to Response GO17-31 for a discussion of how the Executive Summary to the Draft EIR and outreach materials were provided at both the in-person meetings in printed format, and in electronic format on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified), and how interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. The reference to Enclosure 1 and Enclosure 2 are noted and will be provided to decision makers for their review. While this comment provides a characterization of these documents, the enclosed transcript and resolution speak for themselves.

Comment GO17-35 12. A Final Decision in TCE's Procurement Lawsuit Against Metro May Render the Project Impossible.

The California Endowment brought a lawsuit (a Petition for a Writ of Mandate) in March 2022, seeking to set aside Metro's determination to proceed with ARTT's unsolicited proposal for a multi-million-dollar gondola project. This lawsuit was heard on January 6, 2023. A decision on this lawsuit was issued on Monday, January 9, 2023, denying the writ of mandate but that may not yet be a final decision.

Response GO17-35 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate). The commenter's appeal in this lawsuit was abandoned on May 26, 2023, and accordingly the Los Angeles Superior Court's decision is final. Even so, the Los Angeles Superior

Court recognized that "Setting aside the MOA would not preclude Metro from completing its environmental review of the proposed project."

Comment GO17-36 B. Metro is not the Appropriate Lead Agency.

1. The Statute Cited by Metro as its Authority to Approve or Supervise the Project Does Not Give Metro Such Authority.

The applicable statute, Public Resources Code section 21067, defines a lead agency as a public agency having the principal responsibility for carrying out or approving a project. Metro simply assumes in the DEIR that it is the lead agency, asserting that Metro has the "responsibility for supervising or approving the project as a whole" without showing under what statutory authority it has that responsibility or authority. (DEIR, p. ES-1) The truth is that because this is not a public transportation project, a public/private Metro project, or a project that Metro intends to acquire, other than possibly leasing its forecourt, Metro has no control, responsibility or authority over the project, therefore, Metro is not the proper lead agency for the Project.

The list of permits set out in the DEIR as required for the ARTT does list Public Utilities Code (PUC) section 130252 as requiring "submittal, review, and approval of proposed plans for design, construction, and implementation of the Project," which is Metro's responsibility. (DEIR, p. 2-61.) However, this statute does not grant Metro the degree of authority to authorize, or any authority to supervise the Project, that it claims.

PUC section 130252 applies only to "public mass transit systems or projects, including exclusive public mass transit guideway systems or projects, and federal-aid and state highway projects." (PUC § 130252(a).) However, the Project was not proposed or approved as a public mass transit project; instead, it would be a privately owned and operated (MAR5 220) transportation system primarily serving a small fraction of the public (Dodger baseball game or event ticket holders) on a limited number of days per year. We note that ARTT itself stated in its response to Metro's RFI that Public Utilities Code section 130252 does not apply to the Project. (MAR 207.) ARTT's proposal to Metro for approval of the ARTT explicitly says that the gondola would be privately owned and operated." (Id, emphasis added.) As a private transportation project, the ARTT would be outside the ambit of PUC 130252; Metro's authority to approve it at all has not been shown.

Footnote 5: The Metro Administrative Record ("MAR") and Supplemental Administrative Record ("SAR") are included with a flash drive submitted with this letter. (Enclosure 8.)

Response GO17-36 As discussed in Section 2.0, Project Description, of the Draft EIR, pursuant to its statutory authority under Public Utilities Code section 130252, Metro would issue approvals related to the proposed Project's plans for design, construction, and implementation. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public

for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response GO17-25 for a discussion of how Metro is the appropriate lead agency for the proposed Project. The reference to the administrative record (Enclosure 8) in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 is noted, but because the cited documents are unrelated to the substance of the Draft EIR as they predate the initiation of environmental review, no further response is warranted. The contents of the referenced Enclosure 8 are available on the SB 44 website.[28]

Comment GO17-37 Even if this were a public mass transit project, Metro would have no or only very limited authority to "supervise" the Project, as shown by both PUC sections 130252 subd. (a) and subd. (c). Subdivision (a) provides that:

> All plans proposed for the design, construction, and implementation of public mass transit systems or projects, including exclusive public mass transit guideway systems or projects, and federal-aid and state highway projects, shall be submitted to the commission [here, to Metro] for approval.

(Emphasis added.) In addition, PUC 130252, subdivision (c), provides:

> As used in this section, "plan" means a project description and not the detailed project plans, specifications, and estimates.

(Emphasis added.) Hence, even if Metro did have statutory authority to approve the Project, that authority would only cover approval of the overall plan for the ART, not over the myriad individual design and specifications or estimated costs; supervision of the actual construction, let alone operation, of the Project is not vested in Metro. The emphasis in the statute is on Metro ensuring that proposed transportation project plans are consistent with the Regional Transportation Plan adopted by the regional transportation planning agency (here, the Southern California Association of Governments [SCAG]), not on Metro evaluating the merits of any individual project or supervising any individual project. (PUC § 130252(a).) Metro provides no citation to authority that it may "supervise" the Project. Instead, Metro would have only such contractual rights as Metro and ARTT negotiate between them (completely out of sight of the public) to control or modify the thicket of design and construction details, features, and operational performance of the ART, details crucial to the nature and extent of the Project's impact on the environment.

Response GO17-37 Refer to Response GO17-25 for a discussion of Metro's role as the lead agency and responsibility for implementing the proposed Project. As required by CEQA, the EIR studies the environmental impacts of the proposed Project, including its design, construction, and operations. Certification of the EIR for the proposed Project will provide environmental clearance for the approvals set forth in Section 2.0, Project

[28] Refer to the Correspondence tab, search "Comments on the Draft EIR for the Los Angeles Aerial rapid Transit Project" for email attaching Enclosure 8.zip, dated January 17, 2023, at https://laartsb44.net/#!/documents.

Description, of the Draft EIR, including approvals from responsible agencies such as the City, Caltrans, State Parks, and Cal/OSHA, and approvals from Metro, which will involve additional opportunities for public hearing and comment on the proposed Project. For example, Metro's discretionary authority under Section 130252 to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project does in fact involve several discretionary approvals, including, for example, multiple approvals of design and construction plans, approvals and agreements contemplated in the Memorandum of Agreement and subsequent amendments, and an agreement to integrate fares with Metro's fares / one tap system. The proposed Project would comply with applicable standards, requirements, building codes, and guidelines as determined by the City of Los Angeles, Metro, and/or Cal/OSHA or the appropriate agencies/regulatory authorities during the permitting process for the proposed Project.

Comment GO17-38 Metro itself has repeatedly noted that the Project will not cost Metro a dime, based on ARTT's repeated statements that it will reimburse Metro for all costs involved in acting as lead agency for the Project, and exercising eminent domain to acquire property or air rights if needed for the Project. (MAR 15.) None of ARTT's assurances have covered post-approval actions. Obviously, Metro cannot supervise the Project's construction or operation, or enforce mitigation measures imposed as part of the CEQA process, if it does not spend money; Metro's insistence that it will not spend public funds on the gondola is a tacit admission that it will not – that it cannot - supervise the gondola. Since enforcement of mitigation measures is a crucial part of the role of lead agency (Friends of Kings River v. County of Fresno (2014) 232 Cal.App.4th 105, at 116)), and since Metro has effectively disabled itself from being able to enforce such measures, Metro cannot properly serve as lead agency.

Response GO17-38 The document cited at MAR 15 (included in the administrative record in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 and in this comment) does not stand for what the commenter uses it to assert – there is no mention of eminent domain within/at MAR 15. ARTT LLC has reimbursed Metro for staff time and costs for the proposed Project pursuant to a Memorandum of Agreement between Metro and ARTT LLC. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Metro's receipt of funding from the Project Sponsor for the proposed Project does not negate Metro's authority as lead agency; it is commonplace for a project sponsor to reimburse a lead agency's efforts related to a project. In other words, Metro's authority as lead agency, and ability to supervise the proposed Project, is unrelated to whether or not it "spend[s] money." Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures.

Comment GO17-39 2. The CEQA Guidelines Do Not Support Metro's Claim to Be the Lead Agency.

The CEQA Guidelines provide guidance on determining the lead agency for a project at section 15151. That guidance disfavors Metro. Subsection (a) provides that if a public agency will carry out the project itself, that agency will normally be the lead agency. Metro has been very clear that the agency will not carry out the gondola Project (MAR 198 ["Metro does not envision taking a hands-on, prescriptive, or performance minded approach to this project"]), and both ARTT's Proposal and its responses to Metro's Request for Information (RFI) repeatedly emphasize that ARTT, not Metro, will handle the design, construction, and operation of the Project. (MAR pp. 2, 15, 189, etc.) Metro does not qualify as lead agency on this count. Since Metro has also stated that it will not take a "prescriptive" role regarding the Project, it also has admitted that it will not supervise the Project.

Guidelines section 15051 provides guidance for assigning the lead agency role where one agency will not carry out the project itself. Where two or more public agencies will both have a role in approving or supervising a project, Guidelines section 15051 subd. (b) provides:

(b) If the project is to be carried out by a nongovernmental person greatest responsibility for supervising or approving the project as a whole.

Subsection (b)(1) further provides that:

(1) The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose, such as an air pollution control district or a district which will provide a public service or public utility to the project.

Again, Metro itself has disavowed any role in supervising the Project; in addition, it is the very kind of agency the Guidelines disfavor: Metro is a single-purpose public

transportation agency that does not have "general governmental powers," e.g., land use and zoning powers (except for land it owns).

In Center for Biological Diversity v. County of San Bernardino (2016) 247 Cal.App.4th 326, the Court of Appeal had to determine which of two agencies, the local water agency or the County, should be the lead agency for a project to pump, transfer, distribute, and store groundwater. The Court of Appeal set out the degree of participation in approving and supervising a project that was required for the single purpose water agency to claim the lead agency role. The opinion lays out in great detail the water agency's proposed role in carrying out the project: it would obtain financing for the pumping and transfer, approve the design and construction of the wells, approve the design and construction of the pipelines and conveyance facilities, manage and oversee the project's operation, control and operate the joint powers agency that would distribute the water, and oversee compliance with the overall plan, among several other functions. (Id. at 340-343.) In short, the court held that the water agency had the most active and extensive role in carrying out the project, and therefore was the proper lead agency. (Id., at 343.) Here, Metro's role does not encompass planning, designing, operating, or managing the Project. It simply cannot justify its self-designation as lead agency. Instead, Metro has explicitly disavowed such an active role in carrying out or supervising the Project. (MAR 198.) Almost the only function it will carry out that the water agency in CDB v. County of San Bernardino performed is acquiring land.

The designation of the lead agency is vital to the EIR process, particularly due to the lead agency's role in certifying the EIR and choosing among alternatives to the project. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, at 736-737.) A court has taken the necessary step of ordering a completed EIR to be decertified and redone, where an improper lead agency had prepared and certified it. In Planning and Conservation League v. Department of Water Resources (200) 83 Cal.App.4th 892 ("PCL v. DWR"), the project was the implementation of an agreement among several water districts and the state Department of Water Resources (DWR) as to how State Water Project water would be allocated among water districts statewide in the face of serious water shortages. The EIR had been prepared and certified by one of the local water districts that would itself receive water under the agreement. / The court directed that the certification of the EIR prepared by this local agency be vacated, and that a new EIR be prepared with DWR as lead agency, because DWR had primary responsibility for managing the state's water resources, and only the statewide agency, with its statewide view of the water situation and its power to enforce the water allocations, was the appropriate agency to prepare the EIR. (Id. at 926.) Should Metro proceed to certify the ARTT EIR as lead agency, a similar remedy would be appropriate.

Guidelines section 15051, subd. (d) provides if more than one agency "equally meet the criteria" to perform as lead agency, the agencies may designate the lead agency

by agreement.[6] Here, ARTT requested that Metro take the lead agency role in the CEQA process and Metro agreed. This Guideline subsection does not authorize a private party and an agency to agree on a lead agency in this fashion, and they were "not at liberty to anoint" Metro as lead agency when it does not meet the regulatory criteria. (PCL v. DWR, 83 Cal.App.4th at 906.) The agreement, and Metro's claim to be lead agency, are invalid.

Footnote 6: Of course, that Guideline subsection does not apply here, since Metro does not meet the criteria.

Response GO17-39 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO17-25 for a discussion of how Metro is the proper lead agency for the proposed Project as it has the primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Further, Metro is responsible for the County's regional transportation system and has considerable land use authority in the County to carry out its roles and responsibilities as the regional transportation authority. Metro is therefore not akin to a special utility district and *Center for Biological Diversity v. County of San Bernardino* (2016) 247 Cal.App.4th 326 is inapplicable. Moreover, Metro is the appropriate agency to certify the EIR and choose among alternatives to the proposed Project. In *Planning and Conservation League v. Department of Water Resources* (200) 83 Cal.App.4th 892 ("*PCL*"), the court held that the State Department of Water Resources ("DWR") should have prepared and certified the EIR because DWR had "primary responsibility for managing the state's water resources, and only the statewide agency, with its statewide view of the water situation and its power to enforce the water allocations, was the appropriate agency to prepare the EIR." Like the DWR in *PCL*, Metro is the agency tasked with planning, operating, and coordinating funding for the region's transportation system, and is the appropriate lead agency for the proposed Project, which will become an integrated part of the regional transportation system. Further, the state legislature vested Metro with broad authority to carry out its duties under the County Transportation Commissions Act (Public Utilities Code, §§ 130000, *et seq*.), which includes "achiev[ing] the operation of a coordinated and integrated transportation system which will reduce automobile usage and dependency, reduce the consumption of scarce and expensive energy fuels, and reduce the levels of automobile-related air pollution." (*Id*., § 130001(b).) Metro is authorized to "[d]o ***any and all things*** to carry" these purposes. (*Id*., §130105(f) [emphasis added]; see also *id*. at § 130050, 130051.13, 130051.14, 30001(a).) The proposed Project has been determined to be consistent with this statutory purpose by a court, which also noted that "Metro has broad legal authority" under state law. (*The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 [Jan. 9, 2023, Order Denying Petition for Writ of Mandate], p. 8].) In addition, under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §

15051(c).) Metro elected to serve as lead agency, and this designation was not disputed by other agencies. Further, Metro independently decided to act as the CEQA lead agency following the Unsolicited Proposal Process and entered into the Memorandum of Agreement (MOA) with ARTT LLC in order to memorialize their findings and provide a process for ARTT LLC to reimburse Metro for its staff time and costs. The MOA is unrelated to CEQA and the Draft EIR. Further, this comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate).

Comment GO17-40 3. Metro Does Not Have the Appropriate Authority Over the Project.

As discussed above, Metro does not have principal authority for approving or supervising the Project. Other agencies have considerably more specific approval authority and would exercise considerably more supervisory authority over the Project, than Metro. Looking at the list of permits required for the Project at DEIR pp. 2-57 to 2-62, approval/supervisory authority over the Project is split among several different state and local agencies. Caltrans must issue an encroachment permit before the Project can cross any state highway or freeway (as it must do to link Union Station with Dodger Stadium); the California Department of Parks and Recreation must issue four separate easement/approvals/permits/plan amendments to allow the Project to build and operate the Chinatown Station that will be located partially on State Park land, and to allow it to cross the airspace over the Park; and the Cal/OSHA Amusement Ride and Tramway Division must examine the Project's safety and issue a Certificate allowing construction of the ropeway before the Project can operate, as well as having responsibilities to ensure safe working conditions in various aspects of the Project, including periodic tests of the operational safety of the ropeway system (DEIR, p. ES-12), emergency evacuation plans (DEIR, p. 2-47), construction activities (DEIR, p. 3.9-1), and any other phase of the Project involving worker safety.

Response GO17-40 This comment provides a general recitation and characterization of the text from the Draft EIR. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro has discretionary authority to review and approve "[a]ll plans proposed for the design, construction, and implementation" of the proposed Project (Public Utilities Code § 130252), which will include several discretionary approvals (multiple approvals of design and construction plans, approvals and agreements contemplated in the Memorandum of Agreement and subsequent amendments, agreement to integrate fares with Metro's fares / one tap system). This discretionary authority is considerably more broad than individual land

use and other review and approvals to be issued by responsible agencies for the components of the Project occurring within their jurisdiction. In short, Metro has "the greatest responsibility for supervising or approving the project *as a whole*" and is the appropriate lead agency. (CEQA Guidelines, § 15051(b) [emphasis added].) Simply because other agencies have approval authority for the proposed Project, does not mean that Metro does not have the "principal responsibility" for approving or supervising the proposed Project. Indeed, CEQA recognizes that multiple agencies may have authority over a project. Therefore, CEQA includes the responsible agency process and consultation requirements in order for other agencies to provide necessary review and approval of aspects of a project. (Pub. Resources Code, §§ 21067, 21069.) The proposed Project would require review and approvals from Caltrans, State Parks, the City, and Cal/OSHA, as responsible agencies, in addition to review and approval by Metro as lead agency. Responsible agencies' discretionary approvals required for the proposed Project are secondary to Metro's statutory authority to review and approve transportation projects, and the City and other agencies were appropriately named as responsible agencies. Further, Metro engaged in required consultation with all responsible agencies during the process of preparing the Draft EIR for the proposed Project, in compliance with CEQA. This consultation process included meetings with Metro and the responsible agencies to discuss the scope and content of the environmental information that Metro would include in the Draft EIR (Pub. Resources Code, § 21080.4(b); CEQA Guidelines § 15104), additional consultation with the City and State Parks as Draft EIR preparers, and comments from these responsible agencies on the Draft EIR (Pub. Resources Code, § 21153(c); CEQA Guidelines, § 15086(c).) This consultation process will continue throughout the course of the environmental review process. Consultation helps ensure that the EIR includes the necessary analysis regarding environmental effects within a responsible agency's jurisdiction to allow that agency to rely on the EIR, if ultimately certified, when considering the necessary approvals for the project that fall under its regulatory authority. If Metro certifies the Final EIR, each responsible agency will then conduct its own discretionary review process for the Project approvals it is responsible for. (See Draft EIR, § 2.0, Project Description, pp. 2-57 – 2-62.)

Comment GO17-41 Finally, the City of Los Angeles has direct authority over all streets in the City (DEIR, p. 3.17-1: "All the streets in the Project study area are under the jurisdiction of the City of Los Angeles.") This gives the City the authority to execute a franchise agreement enabling the Project to "operate, over, or along any street, highway, or other place in the City of Los Angeles," without which agreement the Project cannot operate at all (since it travels over City streets or "other place[s]" for its entire length); and approve the design of for the Project components located within the public right-of-way. The City's Planning Department would also be required to approve the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures, would need to approve the

creation of a Sign District to impose a comprehensive set of sign regulations on the Project site and to permit signage consistent with applicable City requirements.

Most importantly, the City must both issue permits for the Project to be built partially on City-owned land (DEIR, p. 2-61), and approve modification of the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow the Stadium Tower and the Dodger Stadium Station to be built and to operate. (CUP Condition 4, at SAR 3102, provides for collaboration by "the operators of the Stadium" and municipal officials "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events.")

Response GO17-41 Refer to Response GO17-40 for discussion of the City's role as a responsible agency and Metro's consultation with responsible agencies, including the City.

Comment GO17-42 The Project will also be built on or cross over land that is within the Alameda District Specific Plan, the Central City North Community Plan, the DTLA Community Plan (current or updated), the Central City North Specific Plan, the Silver Lake-Echo Park-Elysian Valley Community Plan, and the Chinatown Redevelopment Plan (DEIR, pp. 3.11-8 through 3.11-137), all of which are encompassed within the City's General Plan (P. 3.17-5) and the City will be responsible for ensuring compliance by the Project with each such plan. For example, the City would be asked to waive provisions of the River Implementation Overlay District to allow the construction and operation of the Alameda and Alpine Towers and waive provisions of the Cornfield/Arroyo Seco Specific Plan to allow construction and operation of the Chinatown Station. (DEIR, p. 2-62.)

Footnote 7: See, particularly, the map at DEIR, p.3.11-8, showing only some of the varied plans and requirements to which the Project would be subject. Metro does not have the authority and expertise to evaluate and balance the requirements of all these plans, and the other plans described above, with respect to the Project. The City does.

Response GO17-42 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of the proposed Project's consistency with the City's General Plan, and with other local land use plans, including the Alameda District Specific Plan, the Central City North Community Plan, the Central City North Specific Plan, the Silver Lake-Echo Park Elysian Valley Community Plan, and the Chinatown Redevelopment Plan. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency, including consultation in preparation of the Draft EIR. Refer to Response GO17-40 for detailed discussion of the consultation process with responsible agencies.

Comment GO17-43 The final requirement listed in the DEIR as needed from the City of Los Angeles for the Project to go forward is the execution of a Development Agreement between the Project sponsor and the City that will remain in effect for twenty years. [8] (DEIR p. 2-62.) As described in Government Code sections 65864 through 65869.5, in addition to specifying various terms and conditions binding each party, such a development agreement must "require periodic review at least every 12 months" wherein the applicant must "demonstrate good faith compliance with the terms of the agreement." (Govt. Code § 65865.1.) While Metro has disavowed oversight of the Project, the terms that must be included in the development agreement provided for in the DEIR guarantee that the City will continue to monitor the Project at least yearly for the next twenty years. The City will also have statutory authority to enforce the development agreement, pursuant to Government Code section 65865.4 (absent specified conditions, "a development agreement shall be enforceable by any party thereto. . . .")

Footnote 8: The requirements of the Government Code sections cited by the DEIR for development agreements are not discussed in the list of required permits; the reader is left either to guess or to ferret out the information for him/herself. This compromises the DEIR's function both as an informative document and as a document of political accountability. (Laurel Height Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 374, 392.)

Response GO17-43 Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from Metro and other responsible agencies for the proposed Project. Refer to Response GO17-40 for a discussion of the permits and approvals required for the proposed Project, as well as Metro's responsibilities as lead agency and the City's role as a responsible agency. CEQA does not require an EIR to provide the full text of the Government Code sections governing Development Agreements; citation to the specific sections that govern Development Agreements are sufficient for the EIR to function as an informative document. (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) Refer to Response GO17-39 for a discussion of Metro's role as the lead agency and oversight for the proposed Project. Refer to Response GO17-44 for a discussion of how Metro will oversee the implementation and enforcement of certain mitigation measures for the proposed Project, as described in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR.

Comment GO17-44 4. Metro Lacks Intention to Enforce Mitigation Measures Adopted for the Project.

Finally, a lead agency under CEQA may not approve a project that will have significant environmental impacts unless it also adopts mitigation for those impacts or adopts an alternative project that would avoid them. (PRC § 21001, 21081.) The lead agency is responsible for adopting and enforcing mitigation measures for all significant environmental impacts that will be caused by a project and must adopt a mitigation

monitoring process to ensure that the mitigation is carried out. (CEQA Guidelines, § 15097.) The mitigation measures listed in the DEIR for the Project include a multiplicity of plans (e.g., Construction Traffic Management Plan [DEIR, p. ES-14], Construction Monitoring Plan (Built Resources) [DEIR, p. ES-40], Cultural Resources Monitoring and Mitigation Plan (DEIR, p. ES-41], Archeological Testing Plan for Alameda Station (DEIR, p. ES-45], Archaeological Testing Plan for LAUS Forecourt [DEIR, p. ES-47], Archaeological Testing Plan for Los Angeles State Historic Park [DEIR, p. ES-48], Paleontological Resources Mitigation and Monitoring Plan [DEIR p. ES-52], Soil and Groundwater Management Plan [DEIR, p. ES-53], Construction Noise Management Plan [DEIR, p. ES-58, Vibration Monitoring Plan [DEIR, p. ES-67, Temporary Disaster Route Plan [DEIR, p. ES-76], Utility Relocation Plan [DEIR, p. ES-79], and a Fire Protection Plan [DEIR, p. ES-80]. In addition, ARTT will need to prepare a Site-Specific Final Geotechnical Report. (DEIR, p. ES-50.) Metro, again, has stated that it "does not envision taking a hands-on, prescriptive, or performance minded approach to this project."] (MAR 198.) It can be presumed that Metro does not plan to monitor/enforce all these various mitigation plans.

The DEIR appears to assume that ARTT will prepare all these plans. (See, e.g., DEIR 3.13-68 [Construction Noise Management Plan to be prepared by "Project Sponsor."] Presumably, it is the City, with its direct construction permitting responsibilities, local ordinances regulating such impacts as excessive construction noise and expertise in overseeing such plans and mitigation measures, that will perform the required oversight and, if necessary, enforcement. (See, e.g, DEIR's reliance on LA Municipal Code [i.e., the City] to enforce stormwater runoff prohibitions, pp. 3.10-6.) The DEIR leans on the City of Los Angeles to enforce many, if not most of its plans to mitigate the adverse impacts of the Project.

Metro does not meet the statutory or regulatory requirements to be the lead agency for this Project, nor does it commit to performing the oversight necessary to carry out mitigation measures that will supposedly protect the environment from degradation and damage by the Project. Instead, Metro appears to have defaulted to the City to perform oversight and enforcement activities. Metro has abdicated so many of the responsibilities of a lead agency that it cannot be designated as the lead agency.

Response GO17-44 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. This comment suggests that CEQA requires denial of a project, and adoption of an alternative, if the project will result in significant and unavoidable impacts even with implementation of mitigation measures. This is incorrect. Under CEQA, an agency may approve a project with significant environmental effects that cannot be avoided or substantially lessened with mitigation by adopting a statement of overriding considerations. (CEQA Guidelines § 15043). Refer to Response GO17-148 for discussion of Metro's consideration of a reasonable range of alternatives to the proposed Project. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and to Table 7-1, Mitigation

Monitoring and Reporting Program ("MMRP"), of the Final EIR, for the full MMRP for the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded. The MMRP for the proposed Project designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures, nor could it.. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority, and the City's participation in the environmental review process as a CEQA responsible agency. Refer to Response GO17-40 for a discussion of the permits and approvals required for the proposed Project, as well as Metro's responsibilities as lead agency and the City's role as a responsible agency.

Comment GO17-45 C. The DEIR Must Be Revised And Recirculated.

The DEIR must be recirculated after information is added to make it legally adequate. It will not be possible to rely upon the response to comments because the DEIR is so deficient as to render public comment "in effect meaningless." (Laurel Heights I, supra, 6 Cal.4th at 1130.) The purpose of an EIR is to provide the public with detailed information about a project before it is approved. (Pub. Resources Code §§ 21002.1; 21003.1.) "[W]hen significant new information is added to the EIR after public notice is given of the availability of the DEIR, but before certification, the EIR must be recirculated for public review. . . ." (CEQA Guidelines § 15088.5; Pub. Resources Code § 21092.1.) After the information to address the deficiencies identified here and by other public comments is added, a revised DEIR must be recirculated.

D. Denial Of The Project Is Appropriate Because Of Unavoidable Adverse Impacts.

Under California law a proposed project with adverse impacts must be denied if there are feasible alternatives or mitigation measures available that would reduce the project's significant adverse environmental impacts. (Pub. Resources Code § 21002.) Such is the case here. Thus, because a denial is appropriate under CEQA, and would allow study of better alternatives.

Response GO17-45 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO17-149 for discussion of how Metro's consideration of alternatives to the proposed Project complied with CEQA. This comment and the comments in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO17-46 E. Outright Rejection Of The Project Is Appropriate Because Metro Has No Authorization To Pursue The Gondola Proposal.

Metro has no jurisdiction to proceed with the gondola project at all. No environmental review is required at all for a project that a public agency rejects outright. The Project must be rejected outright. As a private project[9] to a single destination, this Project is a common carrier, similar to the Palm Springs Tram which is a tourist ride and does not does not meet the statutory requirements for a public transportation project [49 U.S.C. § 5302 subd. (15)]. In order to confer upon this wholly private project the benefits of non-competition, use of public land, access to eminent domain powers, and fast-track project approval consideration it must be a true public transportation project primarily benefitting the taxpaying public. The mere proximity and potential coordination between a private project and an existing public transportation hub such as Union Station does not turn a private transportation project into public transportation. For example, if the private funicular, Angel's Flight, happened to abut a Metro stop, that would not be sufficient for that private transportation project to be considered a public transportation project—the Gondola Project is no different.

Footnote 9: A "private project" is defined as "a project which will be carried out by a person other than a governmental agency, but the project will need a discretionary approval from one or more governmental agencies" for a contract or lease. (Cal. Code Regs. Tit. 14 section 15377.)

Response GO17-46 This comment provides a general recitation and characterization of regulations. Refer to Topical Response A, SB 44, for discussion of the proposed Project as a public transportation project. The proposed Project is a public transit project because it will be open to the general public for service at regular, scheduled operating hours, operating daily to serve existing residents, workers, park users and visitors to Los Angeles. Refer to Response GO17-40 for a discussion of why Metro is the proper lead agency for the proposed Project. Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment GO17-47 F. The EIR is Inadequate

There are numerous major concerns TCE has with the document that has been released for public review. "The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they--and the environment--will have to give up in order to take that journey." (Natural Resources Defense Council, Inc. v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271.) In this case, critical information is missing from the analysis of numerous impacts. In too many ways, the DEIR understates the impacts that are analyzed, apparently for no other reason than to avoid imposing the cost of mitigating them on the developer. Further, the mitigation measures that are proposed are often deferred

and unenforceable, and many feasible mitigation measures have not been considered.

Response GO17-47 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO17-2 through GO17-46, and below in Responses GO17-48 through GO17-153. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project complied with CEQA and do not impermissibly defer mitigation.

Comment GO17-48 G. Legal Framework And Overview.

1. The Project Description Is Defective (Chapter 3) Because The Project Has Been Piecemealed, And Reasonably Foreseeable Impacts Have Not Been Analyzed Or Disclosed.

ARTT was formed by McCourt Global, which is controlled by Frank McCourt (McCourt). (SAR 2992-92; AR 806, 3116, 3152.) McCourt Global also owns or controls a 50% interest in the parking lots around Dodger Stadium, an interest he kept when he sold interests in them to the Guggenheim Partners, and that McCourt Global holds through the Chavez Ravine Land Company (hereafter, "Landco." (The California Endowment v. Metro, Los Angeles Superior Court case no. 22STCP01030, First Amended Petition, ¶ 32.)

The land surrounding Dodger Stadium, known as Chavez Ravine, represents a large financial opportunity for the owner if the land is developed for more profitable businesses than its current use. Currently, it is used for surface parking, chiefly for Dodger games and events at Dodger Stadium. The company proposing the gondola — Los Angeles Aerial Rapid Transit — makes no mention of future development plans. However, the Covenants, Conditions and Restrictions (CCR) agreed to by the Dodgers' owners and Landco in 2012 (SAR 3054) explicitly provide for development of the parking areas wholly or partially owned by Landco. Article IV of the CCRs is entitled "Regulation of Development," and is wholly devoted to setting parameters for the eventual development of the Landco lands. (SAR 3026-3207) Section 4.1 of the CCRs provides:

The Parties acknowledge that Landco, in the future, may apply for governmental approvals for future development on the Landco Parcels (the "Development"), which Development may include, but shall not be limited to, (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining and entertainment facilities.

(SAR 3026.) The remainder of Article IV is devoted to placing restrictions on the future development as to design, signage, preservation of access to the Stadium, etc. (SAR 3026-28.))

Article V of the CCRs is solely devoted to specifying the ownership, permissible use, and potential ownership transfer of parking capacity at and around Dodger Stadium. In Section 5.1.1, Landco grants to the Dodgers an easement to use not less than 16,500 parking spaces on Landco's land (called "Required Parking Spaces") for the benefit of the Stadium. Section 5.1.1 also recognizes that the existing parking at the Stadium contains approximately 19,000 spaces, with the spaces in excess of the required 16,500 called "Additional Parking Spaces." The CCRs provide that the Dodgers may use the Additional Spaces, subject to six-months' notice from Landco that it wants some or all of the Additional Parking Spaces back.

Section 5.1.2 provides that Landco may also reclaim ownership and use of some of the 16,500 Required Parking spaces, but only if some form of "mass transportation, including, without limitation, a subway or light rail" is built. If this mass transportation is constructed, Landco will have the right to provide fewer than the 16,500 Required Parking Spaces for use by the Dodgers. (SAR 3028-29.) The maximum amount of that reduction is not specified in the CCRs, but the Conditional Use Permit for the entire parcel (Stadium and surrounding land) specifies that one parking space should be provided for every 3.6 seats in Dodger Stadium. (SAR 3101.) Since the Stadium is capped at 56,000 seats, at least 15,555 parking spaces must be made available. (56,000 3.6 = 15,555.56.) Since the parties to the CCRs provided for 16,500 of Required Parking Spaces with the possibility of diminution, there is flexibility for reduction below the Required Parking Spaces number.

The upshot is that at least 2,500 existing parking spaces in excess of the 16,500 Required Parking Spaces (19,000 – 16,500 = 2,500) are available to Landco upon six months' notice, and more could be available if some form of mass transit is built to serve Dodger Stadium. Landco's owner, Frank McCourt, long had plans for an ambitious retail and entertainment complex around the Stadium. Those plans are evident in Mr. McCourt's "Next 50" plan, which was unveiled in 2012 when he owned the Dodgers, and in court documents during the bankruptcy proceedings that forced him to sell the team. (SAR 3189-91.) Mr. McCourt publicly stated that he planned to create a plaza with shops and restaurants, and to create a Dodger museum. (SAR 3183-85.) Mr. McCourt failed to secure funding for "Next 50," but the agreements revealed in the bankruptcy proceeding (still in force) provide insight into the relationship between the proposed gondola and McCourt's plans to develop the parking lots around Dodger Stadium. The various public statements made by Mr. McCourt, together with the meticulously drafted CCRs that allow his Landco to free up hundreds of acres of land now used for parking if a mass transit service is created that could potentially move thousands of persons per hour to and from Chavez Ravine, make it reasonably foreseeable that development will occur around Dodger Stadium. (Banning Ranch Conservancy v. City of Newport Beach (2012) 211 Cal.App.4th 1209 ["The California Supreme Court set forth a piecemealing test in Laurel Heights.

Response GO17-48 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. Further, as discussed in Topical Response G, the adoption of the Covenants, Conditions, and Restrictions ("CC&Rs") over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. As discussed in Topical Response G, the "Next 50" project was proposed over 15 years ago and did not proceed after 2008. The current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in the Draft EIR. Further, as discussed in Topical Response G, the purported "future" development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and zoning, permits, and approvals, including potentially environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed. Moreover, actions from over a decade ago, and speculative comments attempting to assign a motive to such actions, do not evidence a firm and specific commitment to develop the property surrounding Dodger Stadium. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit "foreseeable" development from its analysis, and CEQA expressly discourages such speculation.

Further, the proposed Project will not reduce the number of parking spaces required under the CC&Rs. As discussed in Section 2.0, Project Description, of the Draft EIR, implementation of the Dodger Stadium Station would require the permanent removal of approximately 194 existing parking spaces, and therefore the proposed Project would not reduce the number of "Required Parking Spaces" under the CC&Rs because over 16,500 parking spaces would remain.

Comment GO17-49 'We hold that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.' (Laurel Heights, supra, 47 Cal.3d at p. 396.) Under this standard, the facts of each case will determine whether and to what extent an EIR must analyze future expansion or other action."

The specific facts of this case make it not only reasonably foreseeable, but reasonably likely that the proposed Project is a mechanism to allow Landco to take full possession of a large chunk of what are now parking lots around Dodger Stadium. The gondola project makes little or no economic sense without a major development at Dodger Stadium, which a gondola, as a mass transit project, could facilitate. There are only 81 home games in the regular baseball season. Even adding a maximum of 12 post-season games, a couple of exhibition games, a maximum of four special events a month permitted under the Conditional Use Permit issued by the City of Los Angeles for the stadium (SAR 3104), and the Los Angeles Marathon, at most the gondola is likely to be used at or near capacity on only 144 days per year. Unless, that is, the Dodger Stadium parking lots are developed as the entertainment, retail, and hospitality district like L.A. Live as Frank McCourt has long envisioned.

Response GO17-49 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other developments unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Response GO17-7 for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost

under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO17-50 In 2004, Frank McCourt bought the Los Angeles Dodgers from Newscorp for $430 million. The purchase was financed primarily with loans, with over a third of the purchase price lent directly from Newscorp. At the time of Mr. McCourt's purchase, no specific plans for development of the parking lots surrounding the stadium were made public. However, on April 25, 2008, Mr. McCourt unveiled a sprawling development plan for the stadium itself and the surrounding parking lot areas. Marketed as the "Next 50" plan, the proposed development was slated to include a Dodger museum, a Dodger retail store, office space, and two new parking structures. (SAR 3189-91.) In addition, the project was advertised as a green initiative, including the addition of 2,000 trees in the area around the stadium. The development was expected to cost $500 million, more than McCourt's purchase price for the team.

The "Next 50" plan would have turned the stadium into a retail and entertainment venue to attract customers outside of game times and game days, and expanding the use of Chavez Ravine beyond baseball. Photographs of Mr. McCourt presenting a scale model of development plans at a press conference beside then Mayor of Los Angeles Antonio Villaraigosa showed the proposed changes, including large, terraced plazas lined with trees and new buildings outside of the stadium. Mr. McCourt's planned development was designed to make use of the parking lots surrounding the stadium to increase the economic productivity of the land and turn Chavez Ravine into a year-round destination.

As part of his plans for the "Next 50" development, Mr. McCourt discussed a desire to connect Dodger Stadium to public transit, saying he "hoped local leaders would 'tweak and adjust subway lines' to add a Dodger Stadium stop and provide 'bus access in the interim.'" Then-city- council member Ed Reyes further endorsed connecting the development to new public transit lines, saying that the "renovation 'hopefully can stimulate a whole new transit system that gets us in and out of this great place.'" In developing plans for additions to Dodger Stadium and the surrounding land, Mr. McCourt clearly identified expanded public transit options as increasing potential visitors as well as revenue in new retail and entertainment destinations. This, again, makes his very public development plans for Chavez Ravine reasonably foreseeable if the gondola is built.

Under Mr. McCourt's ownership the Dodgers fell deep into debt, ultimately filing for bankruptcy on June 27, 2011. In addition to bankruptcy court conflicts with Major League Baseball, Mr. McCourt was ordered to pay $150 million in a divorce settlement. The "Next 50" development never materialized, as Mr. McCourt failed to secure funding.

After several rounds of negotiations, a group led by Magic Johnson and financed by Guggenheim Partners won the bid to purchase the Dodgers for $2 billion. As part of the deal, Guggenheim Partners entered into a venture with a McCourt entity to jointly own the stadium parking lots.

The terms of the parking lot sale and any potential future development of the land around the stadium were filed under court seal as part of the supplement to the Dodger's chapter 11 bankruptcy plan on April 6, 2012, in United States Bankruptcy Court for the District of Delaware, case number 11-12010 (KG). With nine sections totaling 139 pages, the exhibit is titled the "Declaration of Covenants, Conditions, Restrictions, and Easements for Chavez Ravine," consisting of 93 pages of terms and agreements relating to the current usage and future development of Chavez Ravine. The exhibit was subsequently recorded by the Los Angeles County Recorder's Office, so it runs with the land at Dodger Stadium.

The bankruptcy exhibit shows that Guggenheim Partners pays $14 million a year to the McCourt entity Blue Landco LLC to rent the stadium parking lots. The document also details possible future developments that "may include but are not limited to (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining, and entertainment facilities." The document includes a provision stating that Guggenheim Partners agrees "to cooperate with Landco, and to take all steps reasonably requested by Landco, in connection with the general plan of improvement and development of the Landco Parcels," and "not to oppose, or to interfere in any fashion (including, without limitation, by speaking out at public hearings) with any efforts by Landco to complete development of the Landco Parcels."(SAR 3049) The CCRs also state at Article II, section 2.1.1 that "[t]he Parties hereby acknowledge and agree that it is contemplated that portions of the Landco Parcels will be developed for other purposes, including potentially in connection with other sports-related development opportunities." This provision effectively grants Landco the sole discretion to attempt to develop the stadium parking lot lands, including with such projects as the Gondola Project station at Dodger Stadium. ARTT which did not exist at the time of the Declaration of Covenants, Conditions, Restrictions, and Easements for Chavez Ravine (CCR's), has no role and no rights in these CCR's.

Response GO17-50 Refer to Response GO17-48 for a discussion of how the proposed Project solely proposes an aerial gondola system, the CC&Rs, and the "Next 50" project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO17-51 Further, the use of "will be developed," rather than "may be developed" in Article II, section 2.1.1 (as cited above) indicates that this development is more than

hypothetical; it is already contemplated and planned for. As Whitman v. Board of Supervisors (1979) 88 Cal.App.3d. 397 held concerning a permit for an oil pipeline:

> The record before us reflects that the construction of the pipeline was, from the very beginning, within the contemplation of [the project proponent] should its well prove productive. Although admittedly contingent on the happening of certain occurrences, the pipeline was, nevertheless part of [the] overall plan for the project and could have been discussed in the EIR in at least general terms.
>
> (Id. at pp. 414–415.)

Here, the facts clearly show that construction of retail or entertainment facilities at Chavez Ravine was kept as an option for future development. It was, and is, reasonably foreseeable, and should be analyzed in the EIR.

Response GO17-51 This comment provides a general recitation and characterization of case law. Refer to Response GO17-48 for a discussion of how the proposed Project solely proposes an aerial gondola system, the CC&Rs, and the "Next 50" project. As discussed in Response GO17-48, the proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit "foreseeable" development from its analysis, and CEQA expressly discourages the speculative analysis that this comment requests.

Comment GO17-52 An additional section of the CCRs states that "in connection to any Mass Transportation… Landco shall have the right to provide less than the 16,500 Required Parking Spaces." This would allow for developments in the parking lots that could significantly reduce the number of parking spaces if the developments were completed after or concurrent with the addition of a mass transit connection to Dodger Stadium. Under this agreement, construction of the proposed Project, connecting the stadium to the transit hub at Union Station could enable Mr. McCourt's vision for additional development in Chavez Ravine to be realized. In John R. Lawson Rock & Oil (21018) 20 Cal.App.5th 77, at 98, the Court of Appeal held that "agency action approving or opening the way for a future development can be part of a project and can trigger CEQA even if the action takes place prior to planning or approval of all the specific features of the planned development." [Citation omitted.] Here, the gondola would open the way for development of Landco's parking lots by satisfying the CCRs' condition that parking requirements could be significantly reduced if mass transit were in place at Dodger Stadium. See, also, Bozung v. LAFCo, where our Supreme Court held that the removal of an obstacle to contemplated development – in that case, annexation of land to a city – rendered the development a reasonably foreseeable impact of approval for the annexation of the land. Here, construction of the gondola would remove an obstacle to additional development at Chavez Ravine.

As the facts show, construction of the gondola is intimately connected to the future development at Chavez Ravine and is therefore one unified project. McCourt Global's

website at one point trumpeted its ownership interest in the 260-acre Chavez Ravine land as a "current real estate project" (emphasis added) during the pendency of Metro's consideration of the gondola proposal. That statement appeared on the website through at least October 2021, although it appears to have been removed from the website once the company began facing significant opposition to its proposed gondola project.'

Response GO17-52 This comment provides a general recitation and characterization of case law. As discussed in Response GO17-48 and Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, the proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. As discussed in Topical Response G, neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. Mere statements on a website are not evidence that such development is currently proposed, nor are they sufficiently firm or committed to such that environmental analysis is required. Refer to Response GO17-48 for a discussion of how the proposed Project would not reduce the number of required parking spots under the CC&Rs.

Comment GO17-53 On April 26, 2018, Aerial Rapid Transit Technologies LLC (ARTT) submitted an unsolicited proposal to Metro for an aerial gondola from Union Station to Dodger Stadium that it calls Los Angeles Aerial Rapid Transit or "LA ART." ARTT was founded by Drew McCourt, Frank McCourt's son. The company at one time claimed that the estimated $125 million project, which estimate is now $300 million (https://www.dailynews.com/2023/01/10/controversial-proposed-aerial-gondola-to-dodger-stadium-wins-a-court-victory/), will be privately funded by Frank McCourt's investment firm and others.

The Gondola Project, as proposed, seems intended to function as a loss-leader for the future development of parking lots at Dodger Stadium. The proposed Project makes no economic sense on its own merits, but it does make sense as a necessary part of a larger development scheme. The economic infeasibility of the gondola as a stand-alone project is highlighted both by the utter failure of ARTT to provide a proforma or other economic data for the proposed Project after the CEQA process would be complete; there is no evidence that the gondola would generate enough revenue to support its own maintenance and operation, let alone to service any debt incurred to finance it. While the original proposal stated that "farebox revenue can finance the Project," no proof was advanced or exists in the current record to show that this is true. Moreover, the current website claims that the Gondola will be free for those

attending Dodger games—which further supports the idea that the Gondola is part of a larger project not included in this EIR. We note that in the original gondola proposal, fares were not specified, but "ARTT LLC envisions that a round trip ride on ART will cost less than the average parking costs at the stadium." (MAR 226.) Now, however, ARTT's website states in its FAQ:

> Just like the Dodger Stadium Express [Metro's bus service from Union Station to Dodger Stadium on game days], the aerial gondola will be free to ride for anyone attending a game at Dodger Stadium, which will maximize the air quality benefits from the project and encourage transit ridership.

Response GO17-53 As discussed in Response GO17-48 and Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, the proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. As discussed in Topical Response G, neither the Project Sponsor nor any other applicant has applied for other developments unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. Refer to Response GO17-48 for a discussion of how the proposed Project would not reduce the number of required parking spots under the CC&Rs. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment GO17-54 The FAQ also states:

> In June 2021, LA ART announced that it had proposed to Metro the creation of a Community Access Program for local residents and businesses to use the LA ART system. This encourages daily use of this zero-emission project by local community members, in addition to the event-day periods when ridership will be prioritized for Dodger game attendees. Outside these times, local residents and employees of businesses in the LA ART vicinity could utilize the aerial gondola using an individual Metro fare or their Metro system access pass at no additional cost.
>
> (https://www.laart.la/faq/; last accessed 11/28/22.)

These new plans show that the farebox will probably not be a source of significant revenue, since so many, probably most, riders will ride at no additional cost to their

Dodger ticket or the usual Metro fare. ARTT's original proposal also made vague suggestions that sale of naming rights and of advertising would provide revenue (MAR 226 ["In-cabin and in-station advertising opportunities are a part of ARTT LLC's business model and may or may not be packaged with an overall system sponsorship agreement"]), but no figures are given or even hinted at. The plain truth is that the gondola has never been shown to be self-supporting. Because the gondola Project did not pencil out on its own economics when proposed, it did not qualify for a sole source determination from Metro. ARTT has produced no substantial evidence in the DEIR to justify the assumption that it will be self-supporting now. The logical conclusion is that the proposed Project's losses will be compensated for by other, future development. In short, it is a loss-leader. Such future development is reasonably foreseeable, even if not actually proposed yet, and must be examined by the DEIR as part of the proposed Project.

Response GO17-54 CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require information related to the funding or financing for a proposed Project. Nevertheless, refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other developments unrelated to the existing stadium uses on the Dodger Stadium property. This comment also raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project, and this decision is final following the commenter's abandonment of their appeal on May 26, 2023.

Comment GO17-55 Finally, the DEIR does not appear to examine the impacts of transferring ownership of the ARTT to a non-profit organization. The change of Project sponsor from a for-profit company that claims to have access to private capital that would fund construction of the gondola to a newly-formed non-profit entity, Zero Emission Transit (https://www.climateresolve.org/climate-resolve-launches-new-nonprofit-

focused-on-zero-emission-transit-dodger-stadium-aerial-gondola-to-be-first-project/#:~:text=LOS%20ANGELES%20%E2%80%93%20Leading%20environmental%20nonprofit,in%20the%20Los%20Angeles%20region; last accessed 11-28-22) for which no such access to private capital has been shown, radically alters the nature and qualities of the proposed Project and must be fully disclosed and analyzed. For one thing, the transfer of the proposed Project to a non-profit with no track record and unknown resources will materially change the level of deferred mitigation that can be considered feasible for the significant Project impacts. How will a non-profit organization, or whoever takes over the Project from ARTT, pay for the deferred mitigation?

Response GO17-55 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise, including funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR would include analysis by a team of qualified experts, consultants, and engineers, including Fehr & Peers as to transportation; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; and Nabih Youssef Associates Structural Engineering as to structure engineering. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project do not impermissibly defer mitigation, as well as how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment GO17-56 In all the above aspects, the Project Description is inadequate.

Response GO17-56 This comment provides a general conclusion regarding the comments raised in Comments GO17-48 through GO17-55. Responses to these comments contained in this letter are provided above in Responses GO17-48 through GO17-55.

Comment GO17-57

GO17-57A 2. Land Use/ Anticipated Uses Are Not Disclosed.

The EIR states the City of Los Angeles will need to enter into a 20-year development agreement pursuant to Government Code sections 65864 through 65869.5 (EIR, p. 2-62.) Such a development agreement may not be approved because it would not be consistent with the City of Los Angeles General Plan. The proposal of the gondola requires far more input from the City of Los Angeles as the brief listing in the anticipated uses section makes clear.

GO17-57B The DEIR should address the handling of ARTT end-of-life and dismantling. If the project proponent or its successors go bankrupt, which is a real possibility given the history of the funder of the project proponent, the City of Los Angeles and Metro may be saddled with the responsibility for either continuing to operate the gondola system or dismantling the towers and stations. To guard against this eventuality, a performance bond should be posted by the project proponent, to the benefit of the City of Los Angeles and Metro, which may be used in the event project cleanup or winding down falls on the shoulders of the public.

Response GO17-57

GO17-57A Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of permits and approvals from responsible agencies that could be required for implementation of the proposed Project. Refer to Section 3.11, Land Use, of the Draft EIR, for a discussion of the proposed Project's consistency with the City of Los Angeles General Plan. Consistent with CEQA Guidelines section 15096(a) and Public Resources Code sections 21104, 21153(c), and 21069, the City of Los Angeles, as a responsible agency, will rely on the information in the EIR to consider the aspects of the proposed Project within its jurisdiction. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of the proposed Project's consultation with CEQA responsible agencies, including the City of Los Angeles. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, and the City of Los Angeles has engaged in this consultation process to ensure that the EIR included the information necessary for the City of Los Angeles to consider the aspects of the proposed Project within its jurisdiction.

GO17-57B Refer to Response GO17-133 for a discussion of how CEQA does not require speculation as to possible future environmental consequences, such as the potential that the proposed Project would not continue operations. Refer to Topical Response

L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO17-58 3. All Reasonably Foreseeable Impacts Of The Project Are Not Analyzed Or Mitigated.

CEQA requires that all reasonably foreseeable impacts of a project must be identified, analyzed, disclosed, and if they are significant, mitigated. (Laurel Heights.) Both direct and indirect impacts must be addressed. (Guidelines § Guidelines § 15382.) Here, the Project description has been artificially truncated to limit the potentially significant impacts the DEIR discloses and for which it offers mitigation.

Response GO17-58 Section 2.0, Project Description, of the Draft EIR, includes 62 pages of detailed descriptions of the whole of the action considered as part of the proposed Project. In turn, the Draft EIR fully analyzes and discloses the potential environmental impacts of this proposed Project, providing mitigation as necessary for potentially significant impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO17-59 4. There Is No Reliable Estimate Of The Gondola's Lifespan.

The truncation begins with an assumption of a 30-year lifespan for the proposed Project, backed with no engineering or commercial data, but seemingly based solely on the South Coast Air Management District (SCAQMD)'s draft threshold for significance on GHG emissions recommendations for amortization of GHG emissions from construction of industrial projects by spreading such emissions over an assumed life of 30 years.[10] (DEIR, pp. 1-5, 1-6.) There is no further justification for use of a 30-year lifetime for the gondola in the DEIR. The SCAQMD letter to Metro responding to the NOP did not specifically recommend use of this lifespan for the proposed Project, nor does TCE believe that such use is justified. The gondola's lifespan was not estimated in the original proposal; there is only a vague statement that "[o]ur goal is for the system to operate for the full useful life of the mechanical system and it will be replaced with a comparable system of the latest state of the art at that time." (MAR [p.41 of RFI.) No information on the "full useful life of the mechanical system" is provided.

The SCAQMD guidance does not explicitly apply to transportation projects, only to industrial, residential, and commercial projects. (See Guidance at p. 3-18. Nor does the DEIR justify using the 30-year project life for the gondola. Since the operational life of the gondola will determine the extent and magnitude of its public benefits and its environmental impacts, the DEIR should provide a fully justified estimate of the

gondola's useful life, supported by substantial evidence. As Pfieffer v. City of Sunnyvale City Council (2011) 200 Cal.App.4th 1552, at 1561-62 holds: "'The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured that those consequences have been taken into account. [Citation.] For the EIR to serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made." The public does not yet have that opportunity here.

Footnote 10: SCAQMD's Board did not formally adopt this draft proposal.

Response GO17-59 This comment provides a general recitation and characterization of case law. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Sections 3.03, Air Quality, and 3.08, Greenhouse Gas Emissions, of the Draft EIR, for a discussion of how the proposed Project would not result in a significant impact with respect to either air quality or greenhouse gas emissions. The commenter questions the assumption of the lifespan of the proposed Project, but the commenter does not identify how this question could contribute to a significant impact related to air quality and greenhouse gas emissions. Rather, the proposed Project's benefits to air quality and greenhouse gas emissions are expected to increase over time. Thus, a longer expected lifespan would only serve to improve upon the environmental benefits discussed on pages 1-5 and 1-6 of Section 1.0, Introduction, of the Draft EIR, as each year the proposed Project operates, there are additional benefits to GHG due to the reduced emissions from passenger vehicles. For purposes of the GHG analysis, the Draft EIR followed the industry standard approach common for EIRs and consistent with SCAQMD guidance to amortize construction emissions over an assumed 30-year project life. Even if a longer proposed Project life were assumed, the proposed Project would not result in increased emissions compared to those analyzed in the Draft EIR.[29]

[29] There are numerous examples of aerial transit systems operating for more than 30 years. For example, the Mt. Pilatus Aerial Cableway "Dragon Ride" opened in 1956 in Switzerland, and has been operating continuously with the exception of brief periods of closure for modernization efforts. It was renovated in 1983 and again in 2015. See Pilatus. 2023. Aerial Cableway Dragon Ride Facts. Available at: https://www.pilatus.ch/en/discover/aerial-cableway/aerial-cableway-dragon-ride. Accessed June 2023. The Banff Sulphur Mountain Gondola opened in 1959 in Canada, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Banff Adventures. 2016. Reaching to the Sky - The Historic Banff Gondola. Available at: https://www.banffadventures.com/News/ArtMID/461/ArticleID/37/Reaching-to-the-Sky-The-Historic-Banff-Gondola. Accessed June 2023. The Roosevelt Island Tramway opened in 1976, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Roosevelt Island Operating Corporation. 2023. Tram History. Available at: https://rioc.ny.gov/168/Tram-

As noted above, the assumption of the proposed Project's lifespan was used to determine the length in time over which construction GHG emissions should be amortized so that the construction emissions can be considered together with the operational emissions. This approach is described in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR and is a well-accepted methodology employed in analyses to meet CEQA requirements across the state. Notably, it is based on guidance from SCAQMD, which employs and recommends the use of a 30--year project life as stated in its Draft Guidance Document – Interim CEQA GHG Significance Threshold. In this guidance, there are recommendations regarding use of a 30-year project life, where it is stated "Therefore, SCAQMD staff is recommending that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies"[30] Thus, this assumption and methodology is well-substantiated, and the public has been given an adequate opportunity to comment. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines, § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. No further evidence is required.

The comment suggests that this SCAQMD methodology only applies to industrial, residential, and commercial projects, and that transportation projects should be handled differently. Yet, the comment provides no basis on why this proposed Project should not follow the same guidance or why it would be inapplicable to the proposed Project. As noted above, it is standard practice in CEQA documents to assume a 30--year project life for purposes of amortizing construction GHG emissions. Even if the Draft EIR were to use a longer life for the proposed Project, it would not result in a significant GHG impact because the proposed Project results in net GHG reductions

History#:~:text=The%20original%20Roosevelt%20Island%20aerial,was%20opened%20in%20May%201976. Accessed June 2023.The Palm Springs Aerial Tramway opened in 1963, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Palm Springs Aerial Tramway. 2022. History. Available at: https://pstramway.com/about-us/history/. Accessed June 2023. The Renon Cable Car opened in 1966 in Italy, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Ritten. 2023. Renon Cable Car. Available at: https://www.ritten.com/en/1202-railway. Accessed August 2023. e Teleferic de Montjuic opened in 1970 in Spain, and has been operating continuously with the exception of closures between 2004 and 2007 for modernization efforts. See Trenscat. 2023. E Teleferic de Montjuic. Available at: http://www.trenscat.com/tmb/telefericmontjuic_ct.html. Accessed August 2023. The Gatlinburg Aerial Tramway opened in 1973 in Tennessee, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Ober Mountain. 2023. Aerial Tramway. Available at: https://obergatlinburg.com/aerial-tramway/. Accessed June 2023. The Teleférico de Zacatecas opened in 1979 in Mexico, and has been operating continuously with the exception of brief periods of closure for modernization efforts. See Zacatecas. 2021. Zacatecas Cable Car. Available at: https://www.zacatecastravel.com/teleferico. Accessed June 2023. The Santorini Cable Car opened in 1982 in Greece, and has been operating continuously since. See Santorini View. 2023. Santorini Cable Car. Available at: https://www.santorini-view.com/attractions/santorini-cable-car/#:~:text=Its%20construction%20started%20in%20the,prosperity%20and%20development%20of%20tourism. Accessed June 2023The Telluride Mountain Village Gondola opened in 1996 in Colorado, and has been operating continuously since. See Telluride Mountain Village. 2023. The Gondola. Available at: https://www.telluride.com/discover/the-gondola/. Accessed June 2023.The Telecabine Lisboa Cable Car opened in 1998 in Portugal, and has been operating continuously since. See My Beautiful Passport. 2022. Telecabine Lisboa: Portugal's Cable Car & Gondola Lift. Available at: https://mybeautifulpassport.com/telecabine-lisboa-cable-car-portugal/#:~:text=Opening%20in%20the%20spring%20of,the%20river%20and%20modern%20architecture. Accessed June 2023.

[30] See South Coast Air Quality Management District (SCAQMD). 2008. Draft Guidance Document – Interim CEQA GHG Significance Threshold. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2. Accessed August 2023.

as an innovative transportation project that helps reduce vehicle miles traveled (VMT). The approach to amortize the construction emissions assuming a 30-year lifespan following the SCAQMD guidance is appropriate for the Draft EIR to quantify the proposed Project's potential GHG impacts.

Comment GO17-60 5. The Project Has Adverse Impacts That Cannot Be Mitigated Below the Level of Significance.

The EIR admits that vibration impacts of construction of the project will be significant and unavoidable. The best way to avoid these impacts is to deny the project altogether, and to choose the environmentally superior alternative.

Response GO17-60 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts associated with human annoyance from construction of the proposed Project, which would be significant and unavoidable during construction of the proposed Project, even with implementation of Mitigation Measures VIB-A and VIB-B. As discussed on page 3.13-72 of the Draft EIR, "[s]ince the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction, there is no feasible method for mitigating human annoyance impacts. It should be noted that because the human annoyance threshold is so low it is already exceeded on roadways by existing truck trips." Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. As discussed in Topical Response H, the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment GO17-61 6. Some Impacts That Have Been Understated.

"CEQA is essentially an environmental full disclosure statute, and the DEIR is the method by which this disclosure is made." (Rural Landowners Assn. v. City Council (1983) 143 Cal.App.3d 1013, 1020.) "In many respects the EIR is the heart of CEQA." (County of Inyo v. Yorty (1973) 32 Cal.App.3d 795, 810.) The purpose of an EIR "is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment, . . ." (Pub. Resources Code § 21061; emphasis added.) Contrary to these principles, numerous of the impacts that are analyzed in the DEIR are understated. For example, the DEIR dramatically understates the traffic impacts of the Project.

Response GO17-61 This comment provides a general recitation and characterization of federal statutes, case law, and regulations. Refer to Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, for an overview of how the Draft EIR analyzed 20 environmental issue areas with detailed analyses, presenting evidence that is based on scientific and factual data about the cause-and-effect relationship between the proposed Project and potential changes in the environment. The Draft EIR ascertained the magnitude, duration, extent, frequency, range, or other parameters of a potential impact to the extent possible to provide facts in support of finding whether the impacts of the proposed Project would meet or exceed the established significance criteria. In determining whether impacts may be significant, all the potential effects, including direct effects and reasonably foreseeable indirect effects, are considered in the Draft EIR. Refer to Section 3.17, Transportation, of the Draft EIR, for a discussion of the proposed Project's potential transportation impacts. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects..

Comment GO17-62 7. Failure to Analyze Some Impacts.

An EIR must analyze all potentially significant impacts of a proposed project on the environment. (Public Resources Code § 21082.2(a).)

8. Failure to Analyze all Feasible Mitigation Measures to Reduce Acknowledged Impacts.

Many potential mitigation measures are not even considered. For example, the DEIR assumes State Historic Park Impacts will be mitigated by amendment of the Park Masterplan. However, the EIR does not address mitigation by creating additional park space elsewhere or expanding the Park to compensate for lost acreage and usage or other feasible mitigation measures since the EIR incorrectly assumes State Historic Park impacts will be mitigated below a level of significance.

Response GO17-62 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that

were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO17-63 9. Reliance on Vague, Unenforceable, or Deferred Mitigation Measures Violates CEQA.

Mitigation measures must be required in, or incorporated into, a project. (Pub. Resources Code § 21081 (a)(1); Federation of Hillside and Canyon Assoc. v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261.) Deferral of the analysis of the feasibility and adoption of mitigation measures violates CEQA. (Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 306-308.) Again and again, the DEIR relies upon deferred mitigation and mere compliance with regulations.

The mitigation measures listed in the DEIR for the Project include a multiplicity of plans, for example the following:

> Construction Traffic Management Plan [DEIR, p. ES-14], Construction Monitoring Plan (Built Resources) [DEIR, p. ES-40], Cultural Resources Monitoring and Mitigation Plan (DEIR, p. ES-41], Archeological Testing Plan for Alameda Station (DEIR, p. ES-45], Archaeological Testing Plan for LAUS Forecourt [DEIR, p. ES-47], Archaeological Testing Plan for Los Angeles State Historic Park [DEIR, p. ES-48], Paleontological Resources Mitigation and Monitoring Plan [DEIR p. ES-52], Soil and Groundwater Management Plan [DEIR, p. ES-53], Construction Noise Management Plan [DEIR, p. ES-58, Vibration Monitoring Plan [DEIR, p. ES-67, Temporary Disaster Route Plan [DEIR, p. ES-76], Utility Relocation Plan [DEIR, p. ES-79], and a Fire Protection Plan [DEIR, p. ES-80]. In addition, ARTT will need to prepare a Site-Specific Final Geotechnical Report. (DEIR, p. ES-50.)

However, these plans should already be prepared and available for public review now with the EIR, not deferred to a non-public process after project review.

Response GO17-63 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures is consistent with the requirements of CEQA and how CEQA

does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact.

Comment GO17-64 The archeological testing plans for the Forecourt, Alameda Station, and the State Historic Park in particular must not be deferred. In 1999, when archeological investigation was conducted on land that would eventually become the State Historic Park, following the City's attempt to claim there would be no archeological impacts, extensive evidence of historic resources was found including bricks from the original Zanja Madre. (See "History Buffs' Find May Threaten Plans for Plan for Site"; https://www.latimes.com/archives/la-xpm-2000-apr-27-me-24078-story.html.)

In 2011, when archeological testing was conducted at La Plaza construction site at Main Street and Republic, near Olvera Street, an entire cemetery was found that had not been known before. (See "Cemetery found under L.A. construction site" https://abc7.com/archive/7890955/.)

Deferring archeological investigation of the Forecourt, the State Historic Park, and the Alameda Station until after Project approval in this context, where prior underground construction activity has nearly destroyed important evidence of history, would be unconscionable and would violate CEQA.

Response GO17-64 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). Refer to page 37 of Appendix G for a discussion of the records search conducted in connection with the analysis for the proposed Project, noting one 2011 and two 2015 studies regarding the Los Angeles Plaza Cemetery referenced in this comment. Accordingly, this archaeological resource was considered in the analysis for the proposed Project. (See also, Draft EIR, Appendix G, p. 40 [including Resource No. 19-004218, Los Angeles Plaza Cemetery].) As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources, would be less than significant, and all potential impacts related to archaeological resources, including the Zanja Madre and archaeological resources in the vicinity of the proposed Project's Alameda Station and the Los Angeles State Historic Park, would be either less than significant or reduced to less than significant with mitigation, such as archaeological testing plans. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA. The use of plans in mitigation measures does not constitute impermissible deferral.

Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review (for example, where ground disturbance and excavation is infeasible prior to project approval). With respect to Mitigation Measure-CUL-A and Mitigation Measure-CUL-C through Mitigation Measure-CUL-E, as recognized on page 3.5-2, Section 3.05, Cultural Resources, of the Draft EIR, "an archaeological resource may not be recognizable or even observable without ground-disturbing activities." Mitigation Measure-CUL-A and Mitigation Measure-CUL-C through E accordingly outline actions that would be taken in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture.

Comment GO17-65 Mitigation measures are ineffective where they rely on the Project proponent to take various steps or ensure measures are carried out. The Project Proponent, ARTT, has committed to funding no more than 3% of the Project budget related to environmental review and permitting. So without funding commitment to implementation of the Project's mitigation measures, none of them are likely to be carried out or effective.

Response GO17-65 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment GO17-66 10. Failure to Consider a Reasonable Range of Alternatives.

The alternatives section has been described as the "core" of the EIR (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564), and an adequate EIR must describe a reasonable range of alternatives. (Laurel Heights Improvement Association v. Regents of the University of California (1993) 47 Cal.3d 376.) Unfortunately, the DEIR fails miserably in this regard. The DEIR rejects, without substantial evidence, the feasibility of alternatives such as enhanced bus service or a system of escalators or people movers. This is so, even though the DEIR acknowledges that the enhanced bus service is the environmentally superior option.

Response GO17-66 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. CEQA Guidelines section 15126.6(a) explains that an EIR must include a "reasonable range" of alternatives to the project "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Likewise, CEQA Guidelines section 15126.6(f)(2)(A) further clarifies that an EIR is not required to analyze alternatives that would not eliminate or substantially reduce significant adverse effects. An agency's selection and consideration of alternatives is governed by a "rule of reason." (CEQA Guidelines, § 15126.6(a).) As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. The Draft EIR provides sufficient analysis of each alternative and substantial evidence supports the Draft EIR's dismissal from further detailed analysis or recognition that the considered alternative may not meet basic project objectives.

Comment GO17-67 11. The Project Is Inconsistent with the General Plan and Other Applicable Plans.

A general plan is the "constitution for future development." (DeVita v. Napa (1995) 9 Cal.4th 763, 773.) "[T]he requirement of consistency is the linchpin of California's land use and development laws. It is the principle which infused the concept of planned growth with the force of law." (Debottari v. City of Norco (1985) 171 Cal.App.3d 1204, 1213.)

As discussed in more detail below, the proposed Project impermissibly conflicts with the State Historic Park Master Plan and the LA Union Station Development Plan, and other plans of general applicability. For example, the Project is within the jurisdiction

of the Santa Monica Mountains Conservancy, but the applicable plan is not even mentioned or analyzed.

Response GO17-67 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The Draft EIR addressed land use in Section 3.11, Land Use and Planning, of the Draft EIR. Refer to Section 3.11 for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment. To the extent the reference to the "LA Union Station Development Plan" refers to the Union Station Master Plan, responses regarding the Union Station Master Plan are provided in Response GO17-138. Santa Monica Mountains Conservancy ("SMMC") has no discretionary approval authority related to the proposed Project; however, Metro notified SMMC as a trustee agency.[31] Refer to Section 5.0, Corrections and Additions, of the Final EIR, for a discussion of the Rim of the Valley Trail Corridor Master Plan, published by the SMMC.

Comment GO17-68 II. MAJOR SUBSTANTIVE CONCERNS: THE EIR IS FAULTY AND DEFICIENT.

The following comments are listed in the order in which the subject appears, rather than the priority given to them by TCE.

Response GO17-68 This comment provides a general introduction to comments raised in this section of this letter. Responses to the comments in this section of the letter are provided below in Responses GO17-69 through GO17-153.

Comment GO17-69 A. Aesthetic Impacts, Section 3.1 Is Misleading and Uninformative.

The Project will have numerous aesthetic impacts, including impacts to views of the historic SHP and surrounding hills. These impacts must be properly analyzed and all

[31] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

feasible mitigation measures should be imposed or alternatives should be adopted to lessen this significant impact.

"[A]ny substantial, negative effect of a project on view and other features of beauty could constitute a "significant" environmental impact under CEQA." (Quail Botanical Gardens Foundation, Inc. v. City of Encinitas (1994) 29 Cal.App.4th 1597, 1604.) According to the California Court of Appeal, lay opinions that articulate the basis of the opinion can constitute substantial evidence of a negative aesthetic impact. (Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District (2004) 116 Cal.App.4th 396, 402.) Expert testimony on the matter is not required because the overall aesthetic impact of a project is a subjective matter for which personal observations are sufficient evidence of the impact. (Id.; Oro Fine Gold Mining Corp. v. County of El Dorado (1990) 225 Cal.App.3d 872, 882.)

Response GO17-69 This comment provides a general recitation and characterization of CEQA case law. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation of the proposed Project using Key Observation Points (KOPs) critical or representative of the visual character of the area within each Landscape Unit (LU) utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including at Los Angeles State Historic Park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Response S2-5 for a discussion of the

proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics.

Comment GO17-70 1. The DEIR Does Not Disclose the Full Extent of the Aesthetic Impacts.

In its discussion of aesthetic impacts, the DEIR focuses faraway simulations. Appendix C does not present a reasonable disclosure of the impacts that will occur and instead provides a document of advocacy attempting to present gondola tower and station impacts in the best light possible.

The DEIR fails as an informational document for using images that seem intended to minimize impacts. Some examples include:

Figure 2-6 (DEIR, p. 2-16), where a background 195-foot-tall gondola tower looks modest in height compared to foreground telephone poles and buildings;

Figure 2-7 (DEIR, p. 2-20), where even zooming in the overhead image it is impossible to tell the real impact and conflicts between the project easement and buffer;

Figure 2-8 (DEIR, p. 2-21), where the proposed alignment doesn't differentiate between public right-of-way and LASHP when discussing public and private property, completely minimizing park impacts;

Figure 4-7 (DEIR, p. 4-34), where the image diminishes the nature of the visual impact on LAHSP, but still shows the downtown view is almost completely obscured (note that the LASHP General Plan protects that view).

The Key Observation Point locations seem to have been chosen in order to minimize visual impacts rather than fully disclose them.

Response GO17-70 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Identification of potential aesthetic and visual impacts included the identification of Landscape Units (LU) that defined particular viewsheds and/or aesthetic settings within the Project area, as well as Key Observation Points (KOPs) within each LU that are representative of the visual character of the area. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies, including KOPs selected for consideration of impacts to the Los Angeles State Historic Park. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for KOPs and simulations updated in part to provide additional aesthetic and visual illustrations. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than

significant. Figure 2-6 of the Draft EIR depicts Alameda Tower in the foreground and Alpine Tower in the middle ground, looking north on Alameda Street from Main Street. As discussed in Appendix C, Visual Impact Assessment, which includes Figure 2-6 as KOP 9, this shows the simulated viewpoint from the perspective of a pedestrian looking along Alameda Street from the public sidewalk at the southwestern corner of Alameda Street and Main Street, just south of Ord Street. In the simulated view, the proposed Alameda Tower, Alpine Tower, cabin, and cables in the center are the prominent features in the view, and the proposed Chinatown/State Park Station is visible in the distance in the center of the view, beyond the Metro L Line (Gold) elevated ROW. As discussed above, visual simulations were created to show the pedestrian eye level vantage point within photographs and, as such, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment.

Figure 2-7 of the Draft EIR depicts the proposed Project's anticipated ANSI aerial rights requirements and the Additional Separation Buffer, with the ANSI aerial rights requirements in dark grey and the Additional Separation Buffer in light grey. There are no conflicts between these requirements as the Additional Separation Buffer is in addition to the ANSI aerial rights requirements. Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, includes additional figures depicting the proposed Project's anticipated aerial rights requirements and the Additional Separation Buffer. Refer to Appendix N, Additional Separation Buffer, of the Final EIR, for information regarding the Additional Separation Buffer. Similarly, Figure 2-8 of the Draft EIR depicts the Proposed Alignment Over Public ROW/Publicly Owned Property and Private Property, with the public right of way and publicly owned property in teal, private property in purple, and the additional separation buffer in light grey. The additional detail this comment requests is provided on page 5 of Appendix Q, depicting portions of the proposed alignment over the California State Parks property in light green, along with other City, Metro, Caltrans, and privately owned property in their own distinct colors. Accordingly, the Draft EIR clearly shows the distinction between ROW and State Parks property. Figure 4-7 of the Draft EIR depicts the existing and simulated view of the State Historic Park Station, cables, and cabins, included as a component of the Spring Street Alignment Alternative, looking at this station southwest from within the Los Angeles State Historic Park at the Spring Street Junction. This view included in Section 4.0, Alternatives, of the Draft EIR, in the analysis of the Spring Street Alignment Alternative, is consistent with KOP 19 selected for the aesthetics analysis of the proposed Project.

Refer to Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of this Final EIR, for supplemental graphics as to the proposed Project alignment plan and profile, provided in response to comments on the Draft EIR for informational purposes, as larger scale insets of the graphics originally provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR.

Refer to Response GO17-69 for discussion of how impacts to scenic or panoramic views would be less than significant. Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics.

Comment GO17-71 Of course, more troubling are the depictions that were not included. The Aesthetic Impact section fails to address the foreseeable use of gondola cars as mobile and possibly electronic billboards advertising on behalf of any purchasers of such flying billboard space. The foreseeable use of gondola tower and station inside and outside space for advertising signage is not addressed or limited in any way.

Response GO17-71 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's signage. The proposed Project's Sign Concept Plan included as Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local art collaborators. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project, including signage. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment GO17-72 2. There Are Mitigation Measures Available for Impacts to Privacy.

As discussed above, when there are available mitigation measures or alternatives that would lessen the impacts of a project. There are several aesthetic impacts the DEIR should be viewed as significant but the EIR does not acknowledge these impacts.

Response GO17-72 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. In addition, the Draft EIR identifies feasible mitigation measures to substantially lessen identified significant environmental impacts from the proposed Project, in compliance with CEQA's requirements. Refer to Section 3.01, Aesthetics, and Appendix C, Visual

Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant and therefore no mitigation measures are required pursuant to CEQA. Refer to Response GO17-70 for discussion of the Draft EIR's analysis of aesthetic impacts of the proposed Project. In the evaluation of aesthetics, the Draft EIR analysis considers a range of qualifying factors consistent with methods and guidance provided by the Federal Highway Administration (FHWA) for evaluating visual impacts, as well as the CEQA Guidelines and City of Los Angeles CEQA thresholds. The Draft EIR's analysis of impacts to aesthetics was prepared by experts in the field, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR's aesthetics analysis more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment GO17-73 B. Impact 3.3: Air Quality Will Be Significantly, Adversely Impacted by Traffic Drawn by the Gondola Project.

1. Existing Air Quality in Downtown Los Angeles Is Already Degraded.

As a court has noted in connection with a proposed commercial development project in the Central Valley:

> It is well known that air pollution adversely affects human respiratory health. (See, e.g., Bustillo, Smog Harms Children's Lungs for Life, Study Finds, L.A. Times (Sept. 9, 2004).) Emergency rooms crowded with wheezing sufferers are sad but

> common sights in the San Joaquin Valley and elsewhere. Air quality indexes are published daily in local newspapers, schools monitor air quality and restrict outdoor play when it is especially poor and the public is warned to limit their activities on days when air quality is particularly bad.
>
> (Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1219.)

The entire air basin surrounding Los Angeles is designated as a federal-level extreme nonattainment area for ozone, meaning that federal ambient air quality standards are not expected to be met for more than 17 years, and as a serious nonattainment area for CO and PM10. The area is also a federal-level nonattainment area for NOx and PM2.5, as designated by the U.S. EPA. The Basin is a state-level extreme nonattainment area for ozone, and is a state-level nonattainment area for PM2.5 and PM10.

In addition to the impacts that unhealthy levels of pollutants will have on the general population, this Project will cause particularly severe damage to the health of sensitive receptors such as children, the sick, and the elderly within a quarter mile from new traffic patterns in the area.

A Health Risk Assessment ("HRA") should be done because of the new traffic that would be attracted to the area of the Chinatown Station and Union Station.

Local CO2 hotspots from localized congestion could be created and must be analyzed.

Response GO17-73 This comment provides a general recitation and characterization of case law and regulations. Refer to Section 3.03, Air Quality (which includes a CO hotspots analysis), Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, and Appendix N, Transportation Appendices, for a discussion of the proposed Project's potential air quality and transportation impacts. As discussed therein, the proposed Project would reduce vehicular travel, and therefore would improve air quality through the reduction in vehicular emissions. Further, the air quality and health risk analyses in Section 3.03 and Appendix D, consider the impacts to all receptors surrounding the proposed Project, including sensitive receptors such as children, the sick, and the elderly within a quarter mile of the proposed Project.

The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby

reducing VMT and air quality related emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT, and emissions are decreased through reducing vehicle miles traveled. As discussed in Section 1.0, Introduction, of the Draft EIR, the proposed Project would reduce GHG emissions by 3,493 metric tons of carbon dioxide equivalent per year (MT CO2e/year) in the buildout year of 2026 and by 6,277 MT CO2e/year in the horizon year of 2042. The lifetime emissions of the proposed Project over its useful life would be a reduction of greater than 50,000 metric tons of GHGs at 166,653 MT CO2e. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The comment appears to request a CO hotspot analysis. This analysis was provided in Section 3.03, Air Quality, of the Draft EIR, and discussed on pages 3.3-26 and 3.3-27. To the extent the comment is in regard CO2 (a Greenhouse Gas), the Draft EIR comprehensively evaluates GHG in Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR.

Comment GO17-74 2. Construction Emissions Would Be Significant and Must Be Mitigated to a Far Greater Extent than Currently Proposed.

a. More Detailed Disclosure of the Timing of Construction Emissions Is Required.

The DEIR fails to address the significant truck traffic that will be required to haul dirt. It also fails to address the additional noise and pollution that would be associated with that traffic.

There should be a disclosure of the length of the anticipated construction period. The EIR fails to describe mitigations to reduce the concentration of emissions, noise, trash and pollution during construction.

Response GO17-74 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Appendix D, Air Quality/Health Risk Assessment Technical Report, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, for discussion of the proposed Project's air quality and greenhouse gas emissions impacts, including related to construction, concluding that the proposed Project would not result in significant impacts. The Draft EIR analyzed air quality impacts, including those related to emissions from haul truck trips during construction, in accordance with applicable SCAQMD guidance and using CalEEMod®, the most current air quality model endorsed by the SCAQMD and the California Air Pollution Control Officers Association. The CalEEMod® model was developed by SCAQMD in coordination with other California air districts and is recommended for use by SCAQMD. Sources of the

model's calculation methodologies and default data include SCAQMD-specific emission factors, USEPA AP-42 emission factors, EMFAC2021 for vehicular emissions, and studies commissioned by the California Energy Commission and California Department of Resources Recycling and Recovery (CalRecycle). Based on this analysis, the Draft EIR concludes that the proposed Project will not cause an exceedance to any SCAQMD significance, including construction emissions.

The comment incorrectly states that the Draft EIR failed to address truck traffic to haul dirt. The Draft EIR addressed construction assumptions in Section 2.8, Construction, of Section 2.0, Project Description, with additional detail in Table 4-1, Construction Schedule, of Appendix D, Air Quality / Health Risk Assessment Technical Report, of the Draft EIR. Table 4-1 provides substantial evidence for the duration of construction activity and construction phases. The tables of Appendix D provide detailed explanation of the analyses conducted in the Draft EIR and constitute substantial evidence for the proposed Project. Contained as part of this analysis is evaluation of the truck traffic to haul dirt. Specifically, hauling emissions are summarized in Table A.1-2c of Appendix D for each construction activity, and assumptions for hauling trips are provided in Section 4.3.2 and Table 4-4 of Appendix D. As described in Section 3.3.4 of the Draft EIR, the calculated construction emissions would not exceed the SCAQMD mass daily significance thresholds nor create significant health risk (see also Tables ES-1, ES-2, and ES-3 of Appendix D of the Draft EIR), and thus no mitigation measures are required.

The comment also incorrectly suggests that the Draft EIR did not disclose the length of the anticipated construction period. The construction period is described in Section 2.8, Construction, of Section 2.0, Project Description, with additional technical details included in Appendix B, Construction Assumptions and Appendix D of the Draft EIR. The Draft EIR relied on this construction period information when assessing the proposed Project's potential construction impacts.

Refer to Response GO17-75 for a discussion of proposed Project commitments to further reduce emissions from construction. In addition, as discussed in BIO-PDF-H, in Section 5.0, Corrections and Additions, of the Final EIR, all construction workers will be educated and instructed on best practices regarding daily trash clean-up. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. The comment incorrectly claims that the Draft EIR does not analyze noise associated with construction traffic. The Draft EIR addressed noise associated with construction traffic in Section 3.13, Noise, with supporting data provided in Appendix M, of the Draft EIR. As discussed on page 3.13-51 through 3.13-52, construction traffic noise has been analyzed along haul routes serving the Project areas and increases in traffic noise compared to existing conditions would be less than 0.6 dBA along Alameda Street, Spring Street, Broadway,

and Bishops Road, which would be below a barely perceptible increase. Therefore, the Project would not result in significant increases in traffic noise during construction.

Comment GO17-75 b. Additional Mitigation of Construction Equipment Nitrogen Oxide Emissions is Required.

Every feasible mitigation measure possible must be taken to reduce construction emissions.

Response GO17-75 Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report of the Draft EIR, for discussion of the proposed Project's air quality impacts. The Draft EIR analyzed air quality impacts, including those related to nitrogen oxide emissions, in accordance with applicable SCAQMD guidance and using CalEEMod, the most current air quality model endorsed by the SCAQMD and the California Air Pollution Control Officers Association. The CalEEMod® model was developed by SCAQMD in coordination with other California air districts and is recommended for use by SCAQMD. Sources of the model's calculation methodologies and default data include SCAQMD-specific emission factors, USEPA AP-42 emission factors, EMFAC2021 for vehicular emissions, and studies commissioned by the California Energy Commission (CEC) and California Department of Resources Recycling and Recovery (CalRecycle). Based on this analysis, the Draft EIR concludes that the proposed Project would not cause an exceedance to any SCAQMD significance, including NOx emissions. As a result, the proposed Project would not result in any significant air quality impacts.

The comment suggests that mitigation is required to address construction emissions, but construction emissions are less than significant, and therefore no mitigation measures are required, as described in Section 3.3.4 of the Draft EIR. The proposed Project previously committed to the following to further reduce emissions from construction:

- Use of Tier 4 construction equipment for equipment greater than 50 horsepower (AIR-PDF-A)
- Use of selected electrified construction equipment
- Shuttling of construction workers to reduce emissions from individual worker vehicle traffic
- Compliance with SCAQMD Rule 403 regarding fugitive dust by watering active construction areas at least two times daily to minimize fugitive dust emissions

Comment GO17-76 The DEIR should require use of Best Available Control Technology for the construction phase. Further, measures that should be analyzed and adopted if feasible include:

- Prohibit construction vehicles from idling in excess of five minutes.

- Construction contractors should be required to use alternative clean fuel, such as electric or compressed natural gas-powered construction equipment with oxidation catalysts, instead of gasoline- or diesel-powered engines.
- Where diesel equipment has to be used because there are no practical alternatives, the construction contractors should use low-sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with a sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NOx emissions by 50 percent.
- Use aqueous or emulsified diesel fuel for construction equipment. Aqueous diesel fuels have received interim verification by the California Air Resources Board and show a reduction of 16 percent in NOx and 60 percent in PM10 from diesel exhaust.
- Require the use of electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Require the use of newer, lower-emitting trucks to transport construction workers, equipment and material to and from construction sites.
- Limit the hours of operation of one or more pieces of construction equipment.
- Metro should require the Project proponent to investigate the availability of construction equipment retrofitted with particulate filters and give preference to contractors with relatively modern construction equipment that are or could be retrofitted with diesel particulate filters.

Response GO17-76 Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for discussion of how the proposed Project would not result in significant air quality impacts during construction. As discussed in Response GO17-75, the Draft EIR analyzed air quality impacts, including construction emissions, in accordance with applicable SCAQMD guidance and using CalEEMod, the most current air quality model endorsed by the SCAQMD and the California Air Pollution Control Officers Association, and determined that the proposed Project would not exceed any SCAQMD significance thresholds. Therefore, the proposed Project would not result in significant air quality impacts during construction and mitigation measures were not required, as described in Section 3.3.4.

This comment has listed various approaches that can be used to reduce emissions from construction equipment and construction vehicles. As summarized in Response GO17-75, the construction emissions are less than significant, and therefore no mitigation measures are required. The proposed Project has committed to several of these measures, including:

- Use of Tier 4 construction equipment for equipment greater than 50 horsepower (AIR-PDF-A)
- Use of selected electrified construction equipment

- Shuttling of construction workers to reduce emissions from individual worker vehicle traffic

Further, several of the suggestions are also incorporated into the proposed Project by default by nature of being existing regulations. These include:

- CARB Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- SCAQMD Rule 431.2 – Sulfur Content of Liquid Fuels
- California Advanced Clean Trucks

The proposed Project's construction emissions are less than significant and no further additional measures are required.

Comment GO17-77 3. Various Air Quality Analyses and Assumptions are Unsupported.

Air Quality experts EAI have reviewed the DEIR and have the following comments. (A copy of the EAI analysis is attached- Enclosure 6).

a. Gondola Movement Assumptions are Overstated.

The Draft EIR indicates that the tramway will move 5,000 people per hour, with 30-40 people per gondola. If that is correct, a total of approximately 143 gondolas per hour would be needed (35 people x 143 gondolas = 5,005 people). To transport that many gondolas, a gondola would need to arrive, load and leave every 20 to 30 seconds. Each time a gondola arrives at Dodger Stadium, it would also have to empty every 20 to 30 seconds. This timing does not allow for the additional time required for children, the elderly or persons with disabilities who may need more time and assistance. Consequently, the numbers stated in the DEIR, are wildly overstated and likely impossible to achieve. These overly aggressive assumptions lead to an overestimate of the number of people that would use the ARTT as an alternative to driving vehicles or using other forms of transportation. Even at this highly unlikely maximum utilization rate, Dodger patrons who leave the game at its conclusion may have to wait as long as an hour or more for their return trip to Union Station—leaving many patrons stranded and possibly calling for an Uber or Lyft rather than waiting for the Gondola—essentially undercutting the "emission-free" claims of the proponents. Compare this to the Hollywood Bowl that has busses waiting in the wings to immediately transport thousands of guests to parking lots throughout the city and county as opposed to just one fixed location.

Response GO17-77 Refer to Response GO17-187 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI). Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30

minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service.

Comment GO17-78 b. Air Quality Analysis is Flawed.

i. Baseline Assumptions are Incorrect.

The air quality and GHG emission benefits of the project have been overstated. The mobile emissions take credit for non-Project (regulatory) related emissions reductions for future years. This misrepresents the actual impacts of the proposed Project. It mistakenly credits the proposed Project with emissions reductions that are not created by the proposed Project. Instead, the analysis should have used the same basis (emissions factors) to show the real impacts from the proposed Project, without influence from external sources (e.g., unrelated regulations).

Response GO17-78 Refer to Response GO17-188 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-79 ii. Haul Route Air Quality Impacts Are Inaccurately Analyzed.

The haul trips to move soil during construction activities were based on 20 miles per trip. If any hazardous soil is encountered during the excavation, the mileage could be grossly inadequate since contaminated soil needs to be hauled to a hazardous waste facility, the closest of which is Clean Harbors in Buttonwillow, California approximately 140 miles from Union Station. Further, it is likely that the project construction team would know the distances to the landfills that will be used for clean soil so these should be disclosed. The likely landfills for clean soil in the area are the Azusa (21.7 miles from Union Station), Chiquita Canyon (40 miles from Union Station), and Simi Valley Landfills (42 miles from Union Station). The air quality impacts

associated with these construction activities must be revised and updated with accurate assumptions.

Response GO17-79 Refer to Response GO17-189 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI) .

Comment GO17-80 iii. Gondola Operation Benefits Are Overstated.

Emissions for the gondola operations are shown as a negative number (Table 4-8 of Appendix J), which is disingenuous. It would be understandable to calculate the potential emissions from the electricity use then apply GHG credits for a mitigation measure, but showing the value as a negative number implies the proposed Project is generating the GHG credits, which is false.

Response GO17-80 Refer to Response GO17-190 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI),

Comment GO17-81 iv. Battery Backup Should Be a Mitigation Measure.

Emissions for the backup battery system are shown as a negative number (Table 4-10 of Appendix J). The same logic applies. The proposed Project is not generating GHG credits for using backup batteries. Using battery power instead of diesel should be a required mitigation measure.

Response GO17-81 Refer to Response GO17-190 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-82 v. The EIR Uses an Outdated AQMP.

The DEIR relies on the 2016 AQMP, which is outdated. The 2022 AQMP has been approved by the SCAQMD Governing Board on December 2, 2022. (Appendix D).

Response GO17-82 Refer to Response GO17-191 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-83 c. Energy Usage is Inappropriately Analyzed and Mitigated.

Appendix H Energy Technical Report (page 22). The Draft EIR indicates that electricity will be supplied using the LADWP's Green Power Program, indicating that the primary electricity for the project would come from renewable energy sources. As this is one of the primary ways the project is minimizing increases in GHG emissions, an enforceable mitigation measure must be provided to ensure this project assumption is enforced.

Response GO17-83 Refer to Response GO17-192 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI) .

Comment GO17-84 Section 3.0 of the Draft EIR indicates that the environmental setting is the physical conditions in the vicinity of the proposed project at the time of publication of the Notice of Preparation (NOP), which was October 1, 2020. However, data used to

calculate baseline conditions varies. For example, 2019 was considered to be the baseline conditions for the energy analysis (see page 3.6-13). The Draft EIR must explain the appropriate environmental setting and why the impact analysis for different resources used different years. Further data regarding the existing fuel consumption was based on 2016 data, which is at least 8 years old (see page 3.6-13) and not consistent with the release of the NOP.

Response GO17-84 Refer to Response GO17-193 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-85

GO17-85A The DEIR indicates that construction would result in a demand of approximately 864,544 kWh of electricity. (Page 3.6-15.) Please provide the assumptions used to calculate the electricity use during construction.

GO17-85B The DEIR states that the Project's construction electricity use represents a small percentage of regional estimates for the LADWP. (DEIR page 3.6-15 and Appendix H.) It further states that: "The CEC estimates that energy demand in the LADWP planning area will increase to approximately 27,000 to 28,000 GWh in the 2024 to 2026 timeframe, meaning the proposed "project's demand contribution in that period would be approximately 0.002 percent of the projected demand." (see DEIR page 3.6-15). According to the footnote, the peak demand for LADWP is based on a CEC reference from 2016 and used data from 2015. With the move toward renewables and the problems that the electricity grid had maintaining electricity during peak demand periods in 2022, more recent data should be used. Further, for the same reason, the DEIR should explain whether the LADWP has excess RENEWABLE electricity available for the proposed project. Per the DEIR assumptions, it is assumed that all electricity use associated with the operation on the project will be renewable. A mitigation measure should be developed to enforce this assumption.

GO17-85C Further, the DEIR indicates that the peak demand in the LADWP planning area is expected to reach 6,400 to 6,500 MW in the 2024 to 2026 timeframe. Please note that the LADWP reports that the record peak demand was 6,502 MW on August 31, 2017.[11] Therefore this peak demand has already been reached and the data provided in the DEIR is not valid, likely because the information used for the baseline is outdated. The potential energy impacts are significant as LADWP does not currently have the excess electrical supply capacity to provide electricity to the proposed project.

Footnote 11: LADWP Facts and Figures.
https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-pfactandfigures?_adf.ctrl-state=10n9mool8q_4&_afrLoop=494270252036354

Response GO17-85

GO17-85A Refer to Response GO17-194 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

GO17-85B Refer to Response GO17-195 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

GO17-85C Refer to Response GO17-196 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-86 Further evidence of the use of an inappropriate baseline is the Proclamation of a State of Emergency signed by Governor Gavin Newsom on August 31, 2022. The Proclamation declared that immediate action was required to reduce the strain on the energy infrastructure and increase energy capacity during the Extreme Heat Event (late August through early September 2022). The California Independent System Operator (CASIO) forecasted high electric demand due to the extreme heat event with peak load projected to exceed 48,000 MW and which would exceed the available electricity.12 Further, this event was classified as an "emergency event" which allowed existing portable generators (including diesel generators) to operate under emergency conditions, regardless of any permit conditions.

Footnote 12: https://www.gov.ca.gov/wp-content/uploads/2022/08/8.31.22-Heat-Proclamation.pdf?emrc=78e3fc

Response GO17-86 Refer to Response GO17-197 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-87 The DEIR indicates that the proposed project would result in electricity demand of approximately 6.9 GWh/year and dismisses the impact because the electricity increase would be 0.002 percent of the projected statewide demand in 2026. (Page 3.6-16.) However, currently the electricity production is not sufficient to meet current demands during peak electricity use periods (e.g., hot summer months). The DEIR should compare the proposed project's electricity use with the current electricity generation by LADWP, since LADWP will supply electricity to the project beginning in 2026 first. There is currently not sufficient electricity to power the grid during high or extreme heat periods. The impacts on the electricity system should not only be compared to the projected electricity production in 2042 (which may or may not actually occur).

Response GO17-87 Refer to Response GO17-198 in Enclosure 6 to Letter GO17 from Environmental Audit, Inc (EAI).

Comment GO17-88 C. Historical and Cultural Resource Impacts (Section 3.5) Must Be Avoided.

The impacts to the State Historic Park, El Pueblo, and Los Angeles Union Station must be avoided. We agree with comments from the California State Parks Rangers Association (CSPRA), the Los Angeles Conservancy, the California State Parks

Foundation, and Los Angeles Union Station Historical Society (LAUSHS) on these issues.

Response GO17-88 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources, including the Los Angeles State Historic Park, El Pueblo, and LAUS in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Responses to GO28 (California State Parks Rangers Association), GO16 (The Los Angeles Conservancy), GO10 (the California State Parks Foundation), and GO9 and GO11 (the Los Angeles Union Station Historical Society) for responses to the comment letters raised in this comment.

Comment GO17-89 D. Parks and Recreational Facilities (Section 3.16) Impacts Must Be Avoided.

1. The Permanent Construction of Gondola Facilities Will Negatively Impact the Park Experience.

The State Historic Park serves as a rare refuge in the urban environment for relaxation and recreation. The Gondola associated facilities will physically intrude on this refuge space. No portion of the State Historic Park should be taken for gondola facilities. The gondola lines should not be planned to pass over the State Historic Park airspace.

Response GO17-89 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires a vertical clearance of eight feet above grade where pedestrians are present. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the

proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. The proposed Project has less than significant impacts to parks and recreational facilities.

Comment GO17-90 2. Non-Permanent Impacts On The State Historic Park that May Be Significant Are Not Adequately Analyzed In The DEIR.

CEQA requires that every significant environmental impact from a proposed project must be identified, analyzed, reported to the public, and mitigated to the extent feasible. (Pub. Resources Code § 21002, 21081.) The Guidelines make clear that an impact does not have to be permanent to be significant; Guidelines § 15065(d)(1) cites "dust, noise, and traffic of heavy equipment" from construction as potentially significant, and construction is by definition temporary.

Here, the DEIR acknowledges that "[c]onstruction of the Chinatown/State Park Station would require the temporary closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during the approximately 19 months for the construction of the Chinatown/State Park Station." (DEIR, p. 3.16-16.) The DEIR also admits that "Construction of the Chinatown/State Park Station would temporarily fence off portions of the park, generate dust and noise, and introduce heavy construction equipment into the area, which may potentially discourage people from using certain portions of the park, disrupt events occurring at the park, or increase the use of the open portions of the park." (Id.) The DEIR finds such impacts to be less than significant, on grounds that park visitors already experience disruption from special events at the State Historic Park, such as concerts and festivals; also, visitors could still use 30 acres of the Park during construction of the Station, and will only have to put up with the condition for nineteen months. (DEIR, p. 3.16-17.) No mitigation for the loss of park space is proposed or even explored.

The DEIR's reasoning is flawed and inconsistent with CEQA's requirements. When it suggests that park patrons will just take the loss of Park space in stride, the DEIR effectively places the responsibility for mitigating this impact on the park visitors themselves and their fully justifiable expectations for a park, not on the proposed Project.

Response GO17-90 This comment provides a general recitation and characterization of the Draft EIR. The Draft EIR analyzed all potential environmental impacts to the Los Angeles State Historic Park, including in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations. Refer to Section 3.16, Parks and Recreational Facilities, for a discussion of how construction of the proposed

Project would result in less than significant impacts to the Los Angeles State Historic Park. As discussed on pages 3.16-16 to 3.16-17 and 3.16-22, while construction of the proposed Project would require a brief and temporary closure of the southernmost corner and western edge of the Los Angeles State Historic Park beneath the cables for safety purposes, other options for pedestrian access, including the provision of pedestrian detours during construction, would allow for continued pedestrian access within the Project area. In addition, park patrons would still be able to access approximately 30 acres of the 32-acre Los Angeles State Historic Park, including all the recreational areas, during construction activities within the park. In addition, regular park patrons are familiar with temporary park closures as they often occur in conjunction with concerts, fairs, and festivals that take place within the park throughout the year. It is not anticipated that construction activities at the southernmost portion of the park would increase the use in other areas of the park or at other parks and recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated as the portion where construction activities are occurring is primarily landscape and hardscape. Refer to Response GO17-89 for additional discussion of how the ability to use the vast majority of the Park would not be affected by the proposed Project.

Comment GO17-91 The DEIR has already found construction noise levels to be significant and unavoidable at the State Historic Park. (DEIR, p. 3.3-18, 3.13-75). It now equates the disruptions of a few days-long festivals each year with over a year and a half of partial Park loss. Park visitors who are already suffering significant noise levels should also simply adapt and make do with the Park area that is not lost to them, the DEIR implies. But the Guidelines provide that dust and noise may constitute significant impacts; by analogy, the deprivation of park acreage to the public may also be significant, and the DEIR must analyze and report this impact instead of minimizing and dismissing it.

Response GO17-91 This comment provides a general recitation and characterization of the Draft EIR. Refer to Responses GO17-89 and GO17-90 for a discussion of the Draft EIR's analysis of impacts to Los Angeles State Historic Park and how the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project, including to the Los Angeles State Historic Park. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. Operational noise impacts would be less than significant.

Comment GO17-92 It is a fundamental principle of CEQA that the significance of an impact may depend upon the setting, that "an activity which may not be significant in an urban area may

be significant in a rural area." (Guidelines § 15064(b)(1).) Here, the extended loss of even a part of the State Historical Park, one of the few oases of green and peace in the bustle and pollution of downtown Los Angeles for nineteen months (or more) may be significant, even if losing an equivalent portion of the urban landscape elsewhere in downtown might not be. This is especially true when one considers that this is a private project that the public is being asked to sacrifice public land, resources and airspace for, and now even state park property. The DEIR must analyze this impact and mitigate it at this site, for this impact.

Response GO17-92 The Draft EIR analyzed all potential environmental impacts to the Los Angeles State Historic Park, including in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations. As discussed on page 3.16-16 of the Draft EIR, construction of the Chinatown/State Park Station would not require any closures of areas used for recreation. Refer to Response GO17-89 for additional discussion of how the ability to use the vast majority of the Park would not be affected by the proposed Project.

Comment GO17-93 E. Transportation/Traffic Impacts (Section 3.17) Are Understated and Not Sufficiently Mitigated.

Traffic expert Tom Brohard has examined certain portions of the EIR and made the following observations.

1. Dodger Stadium Access Study For Los Angeles County Transportation Commission

Over 30 years ago in August 1990, the Los Angeles County Transportation Commission, the County transportation agency that preceded Metro, retained Gruen Associates with Gannett Fleming to evaluate alternative connections to move people efficiently to and from Dodger Stadium. The enclosed "Dodger Stadium Access Study" evaluated various technologies including shuttle buses, automated guideway transit, light rail transit, gondola tramways, and walkways and escalators.

Six different characteristics were evaluated and compared for the five different technologies as shown in Table 1 of the Study. Table 3 compared boarding and travel time for the different alternatives, with the gondola tram taking an average of 92 minutes and 60-person shuttle buses taking about 43 minutes per passenger, less than half of the time required per passenger for the Gondola trams. The capacity of the shuttle bus system was estimated at 7,200 passengers per hour, over 2.5 times greater than what the gondola system could provide. The aerial gondola system was found to take more than twice as long as the shuttle buses, and shuttle buses were found to move more than double the number of people.

Of the different alternatives evaluated, the gondola was found to have the lowest capacity of any of the systems considered and would have the least positive impact on traffic and congestion. The gondola system then and now is more for sightseeing and entertainment and is not an effective way to move people between places that are 1.2 miles apart.

Response GO17-93 Refer to Response GO17-155 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-94 2. Metro Board Executive Management Committee Report

The September 15, 2022, Metro Board Executive Management Committee Informational Report, Los Angeles Aerial Rapid Transit Project Update, discussed various topics including the traffic studies to be prepared for the Proposed Project. Page 4 states "A separate Project Access, Circulation and Construction Transportation Study will be prepared in accordance with the non-CEQA analysis required by the City of Los Angeles Transportation Assessment Guidelines. This separate technical report will evaluate the Project's potential effects on the intersection level of service."

This study was to be prepared as required and in accordance with the LADOT Transportation Assessment Guidelines issued in August 2022, including potential impacts on intersection level of service. The contents of the analysis are found in Section 3.3, Project Access Safety and Circulation Evaluation. This report was not included in the Draft EIR or Appendix N. Furthermore, this analysis has not been shared with the public. It should have been made available for review and comment.

Response GO17-94 Refer to Response GO17-156 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-95 3. Draft Environmental Impact Report – Executive Summary

The Project Purpose on Page ES-1 states "The proposed project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit service connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and the surrounding communities via three new transit stations… The Proposed Project is needed to alleviate existing congestion and associated air pollution…as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways…"

Both of these statements, as well as many others throughout the Draft EIR, are made without foundation and/or documentation to support them in the Draft EIR or in the technical Appendices. They exaggerate even a best-case scenario that could most optimistically occur.

Response GO17-95 Refer to Response GO17-157 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-96 Access to State Historic Park: Such access is already available via Metro's Gold line which is just one stop from Union station on an already existing line—so the Gondola does not provide any additional benefits, in fact, Metro riders will have to leave the station (instead of just transferring within the station) to walk to the Gondola station, potentially pay an added fare (note Metro would have to negotiate this with the private owners of the Gondola) to get to the State Historic Park which they can already reach via Metro or by walking.

Access to Elysian Park: The proposed Gondola Stop is at the furthest end of the Dodger Stadium parking lot which is far from Elysian Park. Families seeking to picnic at the park will not likely be taking their chairs, equipment and coolers on the Gondola to the park. As with most of the rest of this project, the claim that the Gondola will serve park goers is a red herring to deflect from the sole purpose of the Gondola which is to benefit Mr. McCourt's plans for the development of Dodger Stadium as previously discussed.

Response GO17-96 Refer to Topical Response F, Los Angeles State Historic Park, for discussion of how the proposed Project would provide additional benefits to Los Angeles State Historic Park. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. As discussed in Section 2.0, Project Description, of the Draft EIR, Elysian Park is the oldest and second largest park in the City and features hiking trails, a bike path, horseshoe pits, picnic tables, restroom facilities, and other public amenities. The proposed Project would enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the

Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment GO17-97 Page ES-16 provides a listing of comments from various public agencies. Interestingly enough, no comments are listed as being from the City of Los Angeles Department of Transportation. This lack of response from LADOT is unique in my extensive experience in peer reviews of transportation aspects of various projects in the City of Los Angeles over the last several decades.

With direction from LADOT and as outlined in the LADOT Transportation Assessment Guidelines, a detailed Memorandum of Understanding outlining the methodology and approach to the transportation analysis is typically developed by the Draft EIR transportation consultant. This document is then reviewed, approved, and signed off by both LADOT and the Draft EIR transportation consultant before the transportation analysis begins. There is no evidence that such a Memorandum of Understanding was ever developed, reviewed and approved by both LADOT and by the Draft EIR transportation consultant.

Response GO17-97 Refer to Response GO17-158 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-98 Transportation Mitigation Measure TRA-A on Page ES-72 recommends "visibility enhancements for the Alameda Tower and Chinatown/State Park Station" but then states "visibility enhancement features could include high visibility crosswalk treatments, advance crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalks via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations."

The laundry list provided gives many different possible mitigation measures, but no study or analysis has been conducted to determine which may be appropriate or inappropriate. For example, it is not possible to install traffic signals and all-way stops at the same intersection. The possible mitigation measures must be analyzed now to determine what is needed and warranted. Waiting until some future time to decide what will or will not be done constitutes deferred mitigation, and any such mitigation will not be timely or effective. Deferred mitigation is contrary to professional traffic engineering and transportation planning principles as well as CEQA, the California Environmental Quality Act.

Response GO17-98 Refer to Response G017-159 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-99 Transportation Mitigation Measure TRA-B on Pages ES-73 to Page ES-76 provides more of the same deferred analyses in its discussion. The Construction Traffic Management Plan offers several possible measures but then defers to City of

Los Angeles approvals before implementation. The City of Los Angeles always requires a Construction Traffic Management Plan and there is nothing special or unique here. As one of several examples, "Existing yellow crossings… shall be evaluated in coordination with LADOT to determine if crossing guards should be assigned on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods… If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary." Once again, possible mitigation measures are proposed but no measures are actually studied or planned. TCE will be particularly affected by construction—as stated in TCE's NOP comment letter in Appendix A of the EIR. TCE provides free public conference meeting space to non-profit and governmental organization throughout the County. This Project would seriously and severely disrupt TCE's operations as well as those of tenants in the building and visitors.

The Draft EIR must analyze potential mitigation measures now and determine which are needed and warranted rather than publish yet another laundry list of possible measures which have not been studied or evaluated.

Response GO17-99 Refer to Response GO17-160 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates. Refer to Response GO17-13 for a discussion of how the proposed Project would have temporary, significant noise and vibration (human annoyance) impacts on The California Endowment during construction activities of the Alameda Tower. The proposed Project would not result in any other significant and unavoidable construction or operational impacts to The California Endowment.

Comment GO17-100 4. Draft Environmental Impact Report – Chapter 2 – Project Description

The Purpose and Need Section beginning on Page 2-10 states the Dodger Stadium Express buses carry approximately 1,850 riders on average per game. Page 2-12 states "Within two hours prior to the start and after a game or event at Dodger Stadium, more than 10,000 people could be transported to the stadium by the Proposed Project. The average attendance at a Dodger game was approximately 49,000 for the 2019 season. Given the capacity of the system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system."

This statement is theoretical at best for conditions after a game since very few fans will be willing to wait more than one hour with other transportation options available including Dodger Express Bus as well as Uber/Lyft/Taxi. The UCLA Mobility Lab Study discussed further below found that the Proposed Gondola Project would carry only about 2,200 passengers at most and would transport only 1,380 people after a baseball game.

Response GO17-100 Refer to Response GO17-161 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-101 The loading and unloading of gondola cars are briefly discussed on Page 2-17. However, there is no description or illustration of how passengers would access the gondola cars from the Metro L Line (Gold), how passengers would access the gondolas from ground level, or how passengers would cross Spring Street. Each of these omissions raises significant traffic safety concerns for pedestrians trying to reach and use the proposed gondola system.

Response GO17-101 Refer to Response GO17-162 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-102 Figure 2-27 on Page 2-54 illustrates the location of the proposed gondola support tower within the Alameda Triangle just south of Alhambra Avenue. From that illustration, it does not appear to be possible to provide adequate stopping sight distance through the tower supports for the westbound dedicated left turn lane and the westbound left turn/right turn lane. The Draft EIR must describe how potentially conflicting motorists will be able to see each other through the solid tower support framework.

Response GO17-102 Refer to Response GO17-163 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-103 Page 2-61 does not indicate the requirements to coordinate with and obtain approval from LADOT during construction as well as during operation of the proposed project. The City of Los Angeles has jurisdiction over the roadways that will be impacted, and the Proposed Project must work closely with the City's Department of Transportation by obtaining all required permits and following each of the permit requirements.

Response GO17-103 Refer to Response GO17-164 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-104 5. Draft Environmental Impact Report - Chapter 3.17 – Transportation

Page 7 repeats that the City of Los Angeles Transportation Assessment Guidelines as noted in the Board memo would be followed. The current edition of the LADOT TAG was issued in August 2022. However, the required level of service analysis and comparisons were not included in either the Draft EIR or Appendix N, and this study has not been made available for public review and comment.

Response GO17-104 Refer to Response GO17-156 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-105 The estimates of neighborhood riders and walkers on Page 26 do not appear to consider the topography vertical rise of 200 to 300 feet up to Dodger Stadium in the walkable and bikeable forecasts. The steep slopes of the streets and pathways discourage walking and biking. The estimates of neighborhood riders of the gondola

are significantly overstated and must be reduced to account for the steep topography.

Response GO17-105 Refer to Response GO17-166 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-106 Page 27 states that the vehicle miles traveled (VMT) calculations are based on data collected in Year 2019, but there is no evidence or cross-checking to support that these values are "current" or correct.

Response GO17-106 Refer to Response GO17-167 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-107 Page 32 indicates the Proposed Project will result in only one change to intersection geometrics by shortening the northbound left turn lane from Alameda Street to Cesar Chavez Avenue by 150'. Shortening of this left turn lane by almost half, from 320 feet to 170 feet, which will result in traffic waiting to turn left backing out of the shorter left turn lane, stopping in the through lane, and significantly increasing the potential for rear end collisions. This left turn lane is also signed as a primary route to reach Dodger Stadium. The capacity of this left turn lane will be cut in half, creating the need for other mitigation to accommodate the high northbound left turn demand.

Response GO17-107 Refer to Response GO17-168 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-108 Page 40 incorrectly states that the 35 MPH posted speed limit on Alameda Street equates to 250 feet of stopping sight distance at the marked crosswalk at Alamed Station.

The 7th Edition of "A Policy on Geometric Design of Highways and Streets 2018 The Green Book" published by the American Association of State Highway and Transportation Officials (AASHTO) is the definitive resource of stopping sight distance. This publication is used by Caltrans as well as all local jurisdictions in California. Traffic engineers and transportation planners understand that stopping sight distance is based upon the design speed of the roadway under review, a speed which is typically 10 MPH higher than the posted speed limit. Stopping sight distance for a 45 MPH design speed is 360 feet, not 250 feet, as shown in Table 3-1 on Page 3-4, Stopping Sight Distance on Level Roadways. Other measures to provide 360 feet of stopping sight distance are required.

All other discussions of stopping sight distance must be modified to reflect the use of the design speed which is typically 10 MPH higher than the posted speed limit and that requires additional stopping sight distance accordingly.

Response GO17-108 Refer to Response GO17-169 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-109 Page 41 recommends prohibiting right turns on red at the Alameda Tower as a mitigation measure. "No Right Turn On Red" is not an effective mitigation measure as it does not guarantee safety for pedestrian crossings as vehicles may violate the posted right turn on red prohibition and they are then faced with a condition involving inadequate stopping sight distance.

Response GO17-109 Refer to Response GO17-170 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-110 Page 67 states that Mitigation Measures TRA-A will provide visibility enhancements at Alameda Tower and Chinatown Station but does not discuss what mitigation measures are recommended at these locations. The discussion should be expanded to describe the mitigation measure as has been done for Mitigation Measure TRA-B immediately following.

Response GO17-110 Refer to Response GO17-159 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-111 Other mitigation measures are deferred and may not be timely as required. To be effective and complete, potential mitigation measures identified on the various laundry lists must be studied and evaluated in the Draft EIR, with specific mitigation measures identified.

Response GO17-111 Refer to Response GO17-159 and GO17-160 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-112 6. FEHR & Peers Ridership Modeling (Appendix N of Draft EIR)

Table 5 on Page 21 of Ridership Modeling in Appendix N of the Draft EIR estimates 6,000 game attendees would ride the gondola in 2026. Daily tourist riders on the gondola are estimated to be 1,270 per day on game days and 2,575 per day on non-game days. These forecasts are significantly higher than those presented in the other reports such as the Dodger Stadium Access Study discussed earlier in this letter and in the UCLA Mobility Lab Study discussed later in this letter.

Response GO17-112 Refer to Response GO17-173 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-113 7. FEHR & Peers Draft Parking Study September 2022

Page 1 states "Detailed analysis of traffic associated with the proposed project are separately being evaluated in a non-CEQA transportation assessment in accordance with the City of Los Angeles Transportation Assessment Guidelines. This would involve calculation of level of service and delay at intersections (pre VMT), but these calculations and results are not found in the Draft EIR or in Appendix N.

Response GO17-113 Refer to Response GO17-156 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-114 Pages 2 and 3 indicate that the Chinatown/State Park Station "could" include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge." Specific improvements need to be identified now (see Page 42 of Chapter 3.17) and included within the mitigation measures proposed in the Draft EIR.

Response GO17-114 Refer to Response GO17-175 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-115 Page 10 states that a parking management plan will be developed before operation of the Proposed Project. Doing this at some future time rather than during the Draft EIR constitutes deferred mitigation by stating "Parking management strategies and specific implementation steps will be further detailed in a parking management plan prepared in the future in collaboration with the City of Los Angeles, who would be the implementor of any on-street parking management strategies… However, because the detailed parking management implementation plan will be reliant on completion of construction documents and the final operating plan, it will follow the completion of the environmental process for the proposed project." Parking management is critical to understanding the impacts of this project, the failure to clearly articulate how Mr. McCourt and ARTT intends to manage the displacement of cars from Dodger Stadium to the Chinatown community must be clearly articulated and a mitigation plan provided for comment. This is a matter of environmental justice as stated previously. The fact that no plan for parking mitigation was presented is yet another reason why this Project may not go forward.

Response GO17-115 Refer to Response GO17-176 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the

proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.. Accordingly, because parking and congestion are not considered impacts under CEQA, no mitigation is required, as CEQA Guidelines Section 15126.4 only requires mitigation for significant impacts. Nevertheless, refer to the proposed Project's Preliminary Parking Management Plan.[32]

Comment GO17-116 8. UCLA Mobility Lab – October 24, 2022 Study

A study using current modeling techniques recently completed by two UCLA researchers found that the gondola system could slightly reduce traffic on major roads around Dodger Stadium on the night of a sold-out baseball game, but that impact would likely be very limited. The study found that the gondola would likely take only around 608 cars off the road and that minor change would be unlikely to significantly reduce greenhouse gas emissions and traffic overall.

Response GO17-116 Refer to Response GO17-177 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-117 Other findings of the UCLA Mobility Lab Study are as follows:

a) Contrary to the Draft EIR, the gondola system would not significantly reduce traffic or greenhouse gas emissions around Dodger Stadium.

Response GO17-117 Refer to Response GO17-178 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-118 b) The gondola system would carry fewer passengers than the Draft EIR claims. About 4,690 passengers would take public transportation on game days. Of these, the model predicted 2,500 would use the Dodger Stadium Express buses, meaning that only 2,190 new passengers would take the gondola system. Doubling the number of buses would more than accommodate passengers that could be expected to ride the gondola.

Response GO17-118 Refer to Response GO17-179 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-119 c) Fewer people would take the gondola after the game resulting in more traffic and emissions. The model disclosed about 2,500 passengers switching from the free Dodger Stadium Express buses to the gondola to the stadium, and about 1,000 fans switched back to the shuttle buses after the game. Only about 1,380 fans were

[32] Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

forecast to use the gondola after the game as they would have to wait in long lines to use the gondola.

Response GO17-119 Refer to Response GO17-180 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-120 d) Very few people were predicted to use the gondola for transportation other than getting to or from the games. Only 60 people, about one gondola carload, were forecast to travel to Dodger Stadium during the day, and only about 140 passengers would travel from Dodger Stadium to Chinatown or Union Station during the day.

Response GO17-120 Refer to Response GO17-181 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-121 9. Shuttle Busses and the Coachella Festival Illustrate Better Alternatives Are Feasible.

Many large destination venues choose to use shuttle buses because of the flexibility of expanding or contracting according to need. The fixed catenary system is limited both as to capacity and to location. As City Transportation Engineer for the City of Indio for 15 years, Tom Brohard was deeply involved in getting patrons to and from the Coachella Festival over two weekends in April each year. Shuttle buses from across California and adjoining states were contracted to travel various pre-planned routes throughout the Coachella Valley to and from the festival grounds each of the three days. Coachella successfully used shuttle busses to transport one-third of 250,000 festival attendees—with pre-planned routes and dedicated lanes on festival days—such a public system could also be developed for Dodger stadium games and events.

The successful transportation program developed by the festival promoter, Goldenvoice, split the attendees into three separate but approximately equal groups. These included those who arrived the day before and camped at the site until the day after the festival ended, those who commuted daily to and from the site using Uber/Lyft/taxi, and those who rode Festival provided shuttle buses from hotels to and from the venue each day.

About one-third of the 250,000 daily festival attendees used the shuttle buses, with separated priority lanes on City streets for the shuttle buses near the festival site leading to a designated area within the festival site for shuttle bus loading and unloading. This system involved rapid turnover within the Festival shuttle bus lot with buses quickly filling empty bus parking stalls, loading/unloading passengers, and departing.

Response GO17-121 Refer to Response GO17-182 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would

provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region, especially when compared to alternatives providing a bus service from other locations. The comment states that the fixed catenary system is limited as to capacity and to location but that shuttle buses have the flexibility to expand or contract according to need. The proposed Project has the flexibility to expand or contract capacity according to need by adding or removing cabins from the system. While true that it is limited in regards to location, so are the locations of the primary destinations (Dodger Stadium and Elysian Park) which the proposed Project is intended to serve.

Comment GO17-122 10. Summary and Conclusion

When it was evaluated over 30 years ago, the gondola finished last in comparison with five other transportation alternatives to serve Dodger Stadium. Such a comparison today ends up with similar results.

Response GO17-122 Refer to Response GO17-183 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates

Comment GO17-123 The proposed Gondola is better suited for sightseeing rather than being an effective transportation measure to move large volumes of people in short periods of time. Shuttle buses together with Uber/Lyft/taxi services now serve Dodger Stadium well at a fraction of the cost. An expansion of the shuttle bus operation between Dodger Stadium Express in lieu of the proposed gondola system would efficiently meet the demand to transport people in a cost-effective manner on game days and on special event days.

Response GO17-123 Refer to Response GO17-184 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-124 The omissions and errors summarized and detailed throughout this letter require that each of these issues and items be reanalyzed and reevaluated through additional study before the Proposed Project is considered further by Metro.

Response GO17-124 Refer to Response GO17-185 in Enclosure 5 to Letter GO17 from Tom Brohard and Associates.

Comment GO17-125 F. Impact 3.13: Noise and Groundbourne Vibration Impacts Will Be Significant and Must Be Further Mitigated.

1. Construction Noise is Identified as Significant and Unavoidable.

The EIR identifies the fact that construction equipment noise impacts on sensitive receptors will be significant and unavoidable. (EIR, p. 3.13-31). Such impacts can be avoided by disapproving the Project.

It is not sufficient for purposes of CEQA that the DEIR merely acknowledge the significant impacts. Rather, the DEIR must propose meaningful mitigation measures and alternatives that would avoid or reduce the impact as much as possible.

The construction of noise barriers is one mitigation measure that should be considered and incorporated as appropriate. Other possible noise abatement measures include traffic management measures, creating buffer zones, planting vegetation, and installing noise insulation in buildings.

Insulating buildings can greatly reduce construction noise, especially when windows are sealed and cracks and other openings are filled. Such measures must be adopted to reduce impacts on adjacent buildings.

Response GO17-125 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. As detailed therein, on-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation, and off-site construction traffic noise impacts would be less than significant during all phase of construction of the proposed Project. Consistent with CEQA Guidelines Section 15162.4, the Draft EIR considered and imposed all feasible mitigation, and CEQA does not require the discussion of ineffective or infeasible mitigation measures. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include noise barriers, maintenance of equipment, avoidance of unnecessary equipment idling, the use of electrical equipment where practicable, and locating equipment away from noise-sensitive receptors to the extent feasible. Noise barriers were designed and placed in collaboration with the construction contractor based on the location of noise producing equipment in relation to the sensitive receptors, as well as the physical constraints of the proposed Project site and the proposed Project phase. Details on the noise barriers at each location of the proposed Project stations, towers, and junction are provided on pages 3.13-68 to 3.13-71 in Section 3.13, Noise, of the Draft EIR, with noise barriers ranging in height from eight to 24 feet tall. No other feasible mitigation is available to further reduce construction noise. Although trees and vegetation can contribute to noise reduction, the effectiveness of tree barriers vary based on the density and width of vegetation. Reductions of 6 to 10 dB can be achieved where a dense belt of trees combined with shrubs are 15 and 30 meters wide (approximately 50 to 98 feet wide) and reductions of 5 to 10 dB can be achieved with a dense belt of trees only (with no shrubs providing ground cover) between 15 and 30 meters wide (approximately 50 to 98 feet wide).[33] There is insufficient space along the proposed Project alignment to provide up to 98 feet of vegetation serving as a buffer between proposed Project construction and sensitive

[33] Dobson, Martin & Jo Ryan. 2000. Trees & Shrubs for Noise Control. Available at: https://www.trees.org.uk/Trees.org.uk/files/8c/8c69f212-a82e-424b-96d1-c8ff6dc02403.pdf. Accessed March 2023.

receptors. The proposed temporary noise barriers would provide similar and, in some cases, greater reductions in construction noise as dense vegetation and noise barriers would require less space. In addition, construction noise impacts would be temporary, and the noise created by the planting of such vegetative buffers would likely result in similar noise levels as proposed Project construction. Therefore, the use of vegetative buffers is not feasible. With respect to building insulation, typical building constructions/systems (in warm climate) provide a noise reduction of 12 dBA with windows open and up to 24 dBA for building constructions/systems with windows closed.[34] Therefore, existing buildings provide exterior-to-interior noise attenuation that is not accounted for in the analysis of noise impacts in the Draft EIR. Potential upgrades to building insulation or windows are generally only considered as potential noise mitigation where a project results in significant operational noise impacts because the installation of building upgrades would result in additional construction. This additional construction could result in even greater impacts to sensitive receptors due to the use of equipment and construction activity within currently occupied dwelling units. Proposed project operations would not result in significant noise impacts and the secondary impacts resulting from installation of building insulation upgrades would outweigh any benefit to reducing construction noise impacts. Therefore, insulating existing buildings to reduce construction noise impacts is not a feasible mitigation strategy.

Comment GO17-126 2. Groundborne Vibration Impacts Will be Significant.

The DEIR states that groundborne vibration impacts are significant and unavoidable. (EIR, p. 3.13-62.)

The EIR proposes to require non-vibrating equipment or hand tools if operations occur within 26 feet of the Avila Adobe, El Grito Mural, or The Old Winery structure. (EIR, p. 3.13-73) There is no showing these measures are feasible or would effectively reduce the vibration impacts.

The DEIR thus fails to propose effective mitigation measures for noise and vibration impacts.

Metro must seek to approve a Statement of Overriding Considerations to accept these impacts but cannot do so when there are feasible mitigation measures that have not been adopted and an environmentally superior alternative (enhanced Dodger Express Buses) that is feasible.

[34] United States Environmental Protection Agency (USEPA/EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023. The noise reduction for building in warm climate was selected as a conservative analysis, as the noise reduction for building for cold climate is higher, i.e., 12 dBA for warm climate and 17 dBA for cold climate.

Response GO17-126 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Potential vibration impacts resulting from the proposed Project are associated only with construction of the proposed Project; no vibration impacts were identified for operation of the proposed Project. Vibration impacts associated with construction of the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. CEQA only requires the discussion of mitigation measures that the lead agency determines are feasible and would be effective. The use of non-vibrating equipment or hand tools for construction operations within 26 feet of Avila Adobe, *El Grito* mural wall, and The Old Winery was determined to be feasible and effective in consultation with the Project's construction contractor. For instance, instead of using vibratory rollers the Project's construction contractor could use hand tampers. As explained in detail at pages 3.13-72 to 3.13-73 of Section 3.13, Noise, of the Draft EIR, Mitigation Measure VIB-A requires placement of vibration monitoring equipment approximately 26 feet away from Avila Adobe, *El Grito* mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at Alameda Station requiring heavy equipment or ground compaction devices, and this equipment would notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold so that the construction crew could modify the construction equipment to ensure that the vibration damage threshold is not exceeded. Mitigation Measure VIB-B requires that, for construction work occurring at Alameda Station, at a distance of 26 feet or more from the Avila Adobe, *El Grito* Mural and the Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet and, if the ground compacting equipment cannot achieve the assume reference level, equipment with less than 0.21 PPV, in/sec, at 25 feet, non-vibrating equipment, or hand tools, would be required for ground compaction activities. In addition, any ground compaction or excavation/drilling operations within 26 feet of Avila Adobe, *El Grito* Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. Refer to Appendix M, Noise and Vibration Technical Report, of the Draft EIR, Tables 6-11 and 6-12, for technical assessment of the impact thresholds for Avila Adobe, *El Grito* Mural, and The Old Winery structures and demonstration of the effectiveness of Mitigation Measures VIB-A and VIB-B. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and *El Grito* Mural, would be less than significant.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to

meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Response GO17-132 for discussion of how the proposed Project adopted feasible mitigation measures to minimize construction noise to the maximum extent feasible. No additional feasible mitigation measures are required, and this comment does not raise any feasible mitigation measures that are considerably different from those already analyzed in the Draft EIR.

Comment GO17-127 With regard to noise, Homeboy Industries is identified as NSR-7 in your analysis. Projected noise levels would be 80.3 dBA during construction, 10.5 dBA higher than current ambient noise levels. The EIR notes that even 75 dBA is "clearly unacceptable," even for office use, and that 65 dBA is "normally unacceptable" (page 3.13-48).

Response GO17-127 This comment provides a general characterization of construction noise at NSR 7 (Homeboy Industries), as shown on page 3.13-36 of the Draft EIR. The identified noise level of 80.3 dBA is associated with the foundations and columns phase for construction of the Alpine Tower. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of noise and vibration impacts during construction of the proposed Project. Based on the L.A. CEQA Thresholds Analysis, NSR 7 (Homeboy Industries) would experience a temporary, significant noise impact during construction activities of the Alpine Tower, the duration of which is discussed in Appendix B, Construction Assumptions, of the Draft EIR. As described in Section 3.13, Noise, of the Draft EIR, based on the FTA Manual the construction activities of the Alpine Tower would not result in significant noise impacts at NSR 7 (Homeboy Industries). As discussed in Section 3.13, Noise, of the Draft EIR, for the entire duration of construction, the proposed Project shall provide an 8--foot temporary noise barrier between the construction site and NSR 7 (Homeboy Industries). With the implementation of Mitigation Measure NOI-A, the L.A. CEQA Thresholds Analysis construction noise impact during the Vertical Circulation, Hardscape, Landscape, and Interior Work phase at NSR 7 (Homeboy Industries), would be reduced to less than significant. Implementation of Mitigation Measure NOI-A would be required to reduce the L.A. CEQA Thresholds Analysis impacts at NSR 7 (Homeboy Industries), however, the L.A. CEQA Thresholds Analysis noise impacts at NSR 7 would remain significant and unavoidable during the foundations and columns and structural streel and gondola equipment erection construction phases.

Comment GO17-128 In the analyses of potential vibration impacts, Homeboy is VSR-11, but is not called out as a Measurement Location. Therefore, no specific information about the impacts of drilling (or driving) 120-foot deep (sic) piles is provided. Nonetheless, the DEIR concludes that Homeboy would experience significant "annoyance" from vibration,

even with mitigation, during construction (EIR, page 3.13-63). TCE, whose property is less than 100 feet from the proposed Alameda triangle tower, would also be affected by noise and vibration but is not even identified in the table of sensitive receptors. (EIR, p. 3.13-20.) The Alameda Triangle parcel would be less than 100 feet from TCE's compound but TCE is not recognized at all. This omission must be rectified. Calling such significant impacts mere "annoyance" impacts understates the severity of such impacts. A more detailed and site-specific analysis of the vibration impact on these buildings and operations is required.

Response GO17-128 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, and as shown in Tables 3.13-11 and 3.13-27, Homeboy Industries and The California Endowment are identified as noise and vibration sensitive receptors. Specifically, for the noise analysis, as shown in Table 3.12-11, Homeboy Industries is identified as NSR 7 and The California Endowment is identified as NSR 4. For the vibration analysis, as shown in Table 3.13-27, Homeboy Industries is identified as VSR 11 and The California Endowment is identified as VSR 7.

As noted on page 71 of Appendix M of the Draft EIR, "A construction vibration impact analysis was conducted for those vibration-sensitive receptors (VSRs) that were located within approximately 200 feet of each Project component site. This distance was chosen because vibration attenuates with distance and, at 200 feet, vibration levels for the highest vibration producing equipment for construction of the proposed Project (vibratory rollers) would be less than the most restrictive vibration level (0.12 in/sec PPV) and, therefore, the Project would not impact VSRs beyond 200 feet." As discussed on page 3.13-27 of the Draft EIR, "ground-borne vibration impacts due to the proposed Project's construction activities were evaluated for both on-site and off-site construction activities by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the proposed Project's activities to the applicable vibration significance thresholds. Construction-related vibration is assessed using two different metrics: 1) to assess potential structural damage from vibration and; 2) to assess human annoyance from vibration." As discussed on page 5 of Appendix M of the Draft EIR, "Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep." As noted on pages 3.13-13 to 3.13-15 of the Draft EIR, the evaluation of vibration impacts relied on the Federal Transit Administration (FTA) guidelines to establish the threshold of significance for building damage and human annoyance from vibration. The FTA guidelines' vibration criteria for building damage are listed in Table 3.13-8 of the Draft EIR. The FTA guidelines' vibration criteria for human annoyance are listed in Table 3.13-6 of the Draft EIR. As discussed in Section 3.13, Noise, of the Draft EIR, the noise-sensitive receptors (NSRs) identified in Table 3.13-11 at various measurement locations represent existing noise conditions in a variety of locations throughout the Project area. Unlike the existing ambient noise

conditions used for the noise analysis, existing vibration levels are not typically considered in the assessment of project vibration impacts, so existing vibration levels were not measured for the proposed Project, as discussed at 3.13.3.3, Existing Vibration Conditions in Section 3.13, Noise, of the Draft EIR.

The California Endowment is recognized as a vibratory sensitive receptor (VSR 7) in Figure 3.13-27 of the Draft EIR. Additionally, the potential vibratory effects that would be experienced at VSR 7 during construction of the Alameda Tower are shown on Table 3.13-28. Specifically, VSR 7 would experience vibration at 0.06 PPV in/sec (83 VdB) during excavation work and street work associated with construction of the Alameda Tower. This would exceed the threshold for human annoyance, but not building damage. Homeboy Industries is recognized as a vibratory sensitive receptor (VSR 11) in Figure 3.13-27 of the Draft EIR. Additionally, the potential vibratory effects that would be experienced at Homeboy Industries during construction of the Alpine Tower are shown on Table 3.13-28. Specifically, VSR 11 would experience vibration at 0.16 PPV in/sec (92 VdB) during construction of the Alameda Tower. This would exceed the threshold for human annoyance, but not building damage.

The Draft EIR included a complete analysis of vibration impacts for Homeboy Industries (VSR 11) and The California Endowment (VSR 7) as required by CEQA.

Comment GO17-129 3. Effects of Noise Pollution on Health Are Extensive.

"[T]hrough CEQA, the public has a statutorily protected interest in quieter noise environments." (Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs (2001) 91 Cal.App.4th 1344, 1380.) Despite this clear mandate to analyze noise impacts, the DEIR omits a discussion of the extensive health impacts of noise exposure, as required by CEQA (Cf. Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 521).

Excess noise pollution can cause hearing damage and loss. Loud noise, either experienced as a single event or continuously over time, can damage cells in the inner ear that detect sound and help transmit information on sound to the brain. (https://www.cdc.gov/nceh/hearing_loss/how_does_loud_noise_cause_hearing_loss.html, incorporated by reference.) Damage to these receptor cells is permanent and cannot be repaired. (Ibid.) Such damage can make it difficult to hear, including causing difficulties in understanding speech. (Ibid.)

Sound level is measured in dBA. (https://www.nonoise.org/library/suter/suter.htm#physical, incorporated by reference.) In 1974 the EPA recommended that the equivalent A-weighted sound level over 24 hours ($L_{eq(24)}$) be no greater than 70 dBA to ensure an adequate margin of safety to prevent hearing loss and damage. (https://nonoise.org/library/levels74/levels74.htm, incorporated by reference.) To prevent interference with activities and annoyance, the EPA recommended a day-

night average sound level no greater than 45 dBA for indoors and 55 dBA for outdoors.

The DEIR must relate these health impacts of excessive noise exposure to the Project's significant noise impacts.

Response GO17-129 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. The comment raises concerns with the effect of noise exposure on health with a focus on hearing loss and hearing damage. Los Angeles Municipal Code (LAMC) Noise Regulation Section 111.00 provides that "[i]t is hereby declared to be the policy of the City to prohibit unnecessary, excessive and annoying noises from all sources subject to its police power. At certain levels noises are detrimental to the health and welfare of the citizenry and in the public interests shall be systematically proscribed." Consistent with the understanding that noise can be detrimental to health and welfare, the Draft EIR addressed noise in Section 3.13, Noise, with supporting data provided in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. An analysis of noise impacts consistent with the Los Angeles Municipal Code ("LAMC") Noise Regulation was addressed on pages 3.13-49 to 3.12-50 for construction related impacts and on pages 3.13-53 to 3.13-56 for operational related impacts. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant at all receptor locations. Refer to Response G017-130 for an additional discussion of compliance with the LAMC Noise Regulations.

In addition to the LAMC Noise Regulation, the Occupational Safety and Health Administration (OSHA), the State's Division of Occupational Safety and Health (also known as Cal/OSHA), and Environmental Protection Agency (EPA) have adopted regulations regarding noise exposure to address health impacts from noise including hearing loss and hearing damage. Specifically, OSHA and Cal/OSHA have adopted regulations designed to protect workers against the effects of occupational noise exposure. The OSHA and Cal/OSHA regulations limit the permissible noise exposure to an average of 90 dBA (L_{eq}) over an 8-hour period.[35] In addition, the Environmental Protection Agency (EPA) has identified a 24-hour average exposure level of 70 dBA for environmental noise (i.e., general outdoor noise sources, including; transportation, construction, mechanical, people) to protect potential hearing loss. This EPA-recommended noise level includes a margin of safety and is based on steady noise exposure of 24 hours per day over a period of 40 years.[36] While not specific to

[35] Occupational Safety and Health Administration (OSHA). 2008. Standard 1910.95 Occupational Noise Exposure. Available at: https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.95. Accessed August 2023. See Occupational Safety and Health Administration (OSHA). Standard 5096 Exposure Limits for Noise. Available at: https://www.dir.ca.gov/title8/5096.html. Accessed August 2023.

[36] United States Environmental Protection Agency (USEPA/EPA). 1981. Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/9100OOAJ.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFi

hearing damage or hearing loss, in 1974, the EPA also recommended a day-night average sound level (Ldn) of no greater than 45 dBA for indoors and 55 dBA for outdoors, to prevent interference with activities and annoyance.[37] This day-night average recommendation is generally applied to impacts from operations and not construction.

During construction, as provided in Table 3.13-17 in Section 3.13, Noise, of the Draft EIR, the estimated noise levels associated with the proposed Project's construction activities with implementation of Mitigation Measure NOI-A would be below 90 dBA at all off-site noise sensitive receptors, except for receptors NSR-2 (El Pueblo) and NSR-3 (Mozaic Apartments upper levels). The estimated noise levels at receptors NSR-2 and NSR 3-would be up to 91.8 dBA due to construction activities at Alameda Station, which would exceed the OSHA and Cal/OSHA noise exposure limit if construction activities were to occur at this level for a continuous 8 hours. However, it is not anticipated that noise from construction of the proposed Project would exceed the OSHA and Cal/OSHA noise exposure limit for a continuous 8 hours. As discussed on page 3.13-32 in Section 3.13, Noise, of the Draft EIR, for each construction phase, the worst-case simultaneous equipment mix was analyzed to evaluate the peak-noise levels. It is not anticipated that the peak-noise level would occur for a continuous 8-hour period. Therefore, over an 8-hour period it is not anticipated that the average noise level would exceed 90 dBA (L_{eq}) at any noise sensitive receptors. In addition, it is not anticipated that any individual would be located at a noise sensitive receptor for a continuous 8-hour period during construction activities. NSR-2 (El Pueblo) is located at the perimeter of El Pueblo closest to construction activities. NSR-3 (Mozaic Apartments upper levels) is located on the balcony of the apartment building. It is not anticipated that an individual would be at the perimeter of El Pueblo or outside on the apartment balcony for 8 continuous hours during construction activities. Per EPA, typical building constructions / systems (in warm climate) provide a noise reduction of 12 dBA with windows open and up to 24 dBA for building constructions / systems with windows closed.[38] Therefore, with

eldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C81thru85%5CTxt%5C00000018%5C9100OOAJ.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.

[37] United States Environmental Protection Agency (USEPA/EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.

[38] United States Environmental Protection Agency (USEPA/EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyAc

the standard noise reduction from buildings, the noise level within the interior of NSR-3 would not exceed 90 dBA (L_{eq}).

As provided in Table 3.13-17 of the Draft EIR, the proposed Project's construction noise levels would be higher than the EPA 70 dBA long-term (24 hours per day for 40 years) noise exposure limit for some of the receptor locations. However, construction activities would not extend over a 24-hour period for 40 years. Instead, as discussed in Section 2.8, Construction, and Appendix B, Construction Assumptions, of the Draft EIR, construction activities are anticipated to occur over an approximately 8-hour workday for 25 months. Refer to Table 2-4, Proposed Project Construction Details, for discussion of the duration of construction for each component of the proposed Project. In addition, construction noise when averaged over a 24-hour period would be approximately 4.8 dBA lower than the levels shown in Table 3.13-17 of the Draft EIR. Therefore, people in the vicinity of the proposed Project would not be exposed to the construction noise levels for the long-term period provided in the EPA guidelines.

Therefore, based on the above, people in the vicinity of the proposed Project site would not be exposed to construction noise levels, which would exceed the OSHA, Cal/OSHA and EPA guidelines.

As provided in Table 3.13-26 of the Draft EIR, the cumulative operational noise impacts associated with noise from stations, towers, queuing, and cabins would result in less than significant impacts. Provided in Table 1 below are daytime composite noise levels developed based on Table 3.13-23, LAMC Operational Noise Impact Analysis, and Table 3.13-25, Proposed Gondola Cabin Noise, from Section 3.13, Noise, of the Draft EIR. The subset of Noise Sensitive Receptors provided below were conservatively selected as those most likely to be impacted by the cabins either because of the distance from the Noise Sensitive Receptors to the cabin or the existing nighttime noise levels. Impacts at all other Noise Sensitive Receptors would be less than those provided in Table 1 below. As provided in Table 1, the composite noise levels associated with operations of the proposed Project would range from 44.6 dBA at NSR-7 to 59.4 dBA at NSR-3. Importantly, these noise levels are all below the existing ambient noise levels which range from 56.1 dBA to 69.8 dBA. These noise levels are below the OSHA and Cal/OSHA regulation limiting noise exposure to an average of 90 dBA (L_{eq}) over an 8-hour period. The noise levels are also below the EPA 24-hour average noise exposure level of 70 dBA.

tionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023. The noise reduction for a building in a warm climate was selected as a conservative analysis, as the noise reduction for a building in a cold climate is higher, i.e., 12 dB for warm climate and 17 dB for cold climate.

Table 1 – Daytime Estimated Gondola Noise Levels at the Interior of Off-Site Noise Sensitive Receptors

Noise Sensitive Receptor[a]	Daytime Ambient Noise Levels,[b] dBA L_{eq} A	Daytime Gondola System Operation Noise Levels,[c] dBA L_{eq} B	Gondola Cabin Noise Levels,[d] dBA L_{eq} C	Composite Daytime Noise Levels, [e] dBA L_{eq} D=B+C
NSR-3	69.0	41.2	59.3	59.4
NSR-5	65.6	33.9	50.2	50.3
NSR-6	69.0	36.6	45.2	45.8
NSR-7	69.8	33.1	44.3	44.6
NSR-8	64.7	43.4	57.8	58.0
NSR-9	61.1	29.0	49.1	49.1
NSR-13S	67.7	30.7	45.9	46.0
NSR-14S	58.7	33.1	54.5	54.5
NSR-17N	56.1	41.2	55.1	55.3

Notes:

[a] *The NSRs included in this evaluation were conservatively selected as those most likely to be impacted by the cabins either because of the distance from the NSR to the cabin or the existing nighttime noise levels. Impacts at all other NSRs would be less than those analyzed here.*

[b] *Source: Draft EIR Table 3.13-11*

[c] *Source: Draft EIR Table 3.13-23, daytime operation.*

[d] *Source: Draft EIR Table 3.13-25*

[e] *Estimated noise levels due to proposed Project operation only and do not include existing ambient noise levels.*

As provided in Table 3.12-22 of the Draft EIR, the estimated noise levels from the proposed Project in terms of CNEL ranged from 41.6 CNEL at receptor NSR-18 to 63.1 CNEL at receptor NSR-3. It should be noted that the day-night average sound level (Ldn) is a 24-hour average sound level, similar to the CNEL 24-hour average sound level.[39] Although, the proposed Project noise levels would be higher than the EPA recommended 55 dBA (Ldn) to prevent interference with activities and annoyance for outdoors, the proposed Project noise levels are well below the existing ambient noise levels, i.e., 59.6 CNEL at receptor NSR-18 and 72.7 CNEL at receptor NSR-3. Because the noise levels are below existing ambient, noise from proposed Project operations would not result in measurable noise increases for indoors or outdoors. As such, the proposed Project would not result in a significant impact when compared to the EPA recommended exterior and interior noise limits to prevent interference with activities and annoyance.

Refer to Response G017-130 for discussion of how a single event noise analysis was conducted for the proposed Project.

[39] Day-night average sound level (Ldn) is a 24-hour average noise levels with a +10 dBA adjustment for nighttime (between 10pm and 7am) noise levels. It is similar to the CNEL 24-hour average sound level, but without the +5 dB adjustment for the evening hours (between 7pm and 10pm). Generally, Ldn levels are within 1 dBA of CNEL levels.

Comment GO17-130 4. The DEIR Must Evaluate Sleep Disturbance.

Excessive sound level can have a profound health impact by disturbing sleep. Sleep disturbance is considered "the most deleterious non-auditory effect of environmental noise exposure . . . because undisturbed sleep of a sufficient length is needed for daytime alertness and performance, quality of life, and health." (Basner et al., Auditory and Non-Auditory Effects of Noise on Health (2014) 383 Lancet 1325, 1329.) Repeated sleep disturbance can change sleep structure, including "delayed sleep onset and early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages." (Id. At 1330.) The short-term effects of sleep disturbance include "impaired mood, subjectively and objectively increased daytime sleepiness, and impaired cognitive performance." (Ibid.) Exposure to noise during sleep "may increase blood pressure, heart rate, and finger pulse amplitude as well as body movements." (Stansfeld and Matheson, Noise Pollution: Non-Auditory Effects on Health (2003) 68 Brit. Med. Bull. 243, 244.) In 1974, the EPA observed that a nighttime portion of a day-night average sound level of approximately 32 dB should protect against sleep interference. (https://nonoise.org/library/levels74/levels74.htm, p. 28.)

Despite the potential for these harmful impacts, the DEIR fails to sufficiently analyze sleep disturbance and disclose the Project's risks of sleep disturbance to the public and decisionmakers. The DEIR is required to analyze and disclose "the nature and the magnitude" of the Project's potential impact on sleep disturbance and must connect the potential health impacts of sleep disturbance to the noise impacts from the Project. (Friant Ranch, supra, 6 Cal.5th 502, 519–21.) The Project will be running for sporting events that will run as late as midnight or later, and with spectators filing out afterwards, may not clear out until much later. The DEIR provides no analysis of single event nighttime noise levels to evaluate these impacts. (Berkeley Keep Jets, supra, 91 Cal.App.4th 1344, 1372-82 [EIR that failed to study impacts of single event noise levels was inadequate].)

Response GO17-130 This comment provides a general recitation and characterization of CEQA case law. The comment raises concerns that the proposed Project would result in sleep disturbance. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. However, as discussed on page 2-51 in Section 2.0, Project Description, of the Draft EIR, construction activities would be limited to daytime hours, pursuant to the Los Angeles Municipal Code. Therefore, the proposed Project would not result in nighttime construction impacts and therefore construction of the proposed Project would not result in nighttime sleep disturbance. Regarding operations of the proposed Project, as shown in Table 3.13-26 on page 3.13-58 in Section 3.13, Noise and Vibration, of the Draft EIR, operational noise impacts of the proposed Project

would be less than significant and, as detailed in Tables 3.13-23 and 3.13-25, the operational noise analysis included an analysis that evaluated nighttime noise levels.

The proposed Project would operate with less than significant impacts from operational noise and would typically not be in operation from 12:00 am to 6:00 a.m. Nevertheless, a sleep disturbance analysis including a single event noise analysis (SEL) related to operations of the proposed Project was performed for the Final EIR in response to the comment and is described in further detail below.

The comment also includes a reference to a 1974 EPA document, which indicated that limiting the nighttime noise level to approximately 32 dB, should in most cases, protect against sleep interference. However, the EPA updated its noise levels for sleep disturbance in a 1981 EPA document, which specifies levels for two components of sleep, falling asleep and awakening. [40]As provided in that more recent document, noise levels of 40 to 50 dBA could result in difficulty in falling asleep for some people, and noise levels of 70 dBA or higher would likely result in awakening. [41] The analysis of potential sleep disturbance provided below is based on the more recent 1981 EPA document.

Per EPA, typical building constructions / systems (in warm climates) provide a noise reduction of 12 dBA with windows open and up to 24 dBA for building constructions / systems with windows closed.[42] Therefore, potential sleep disturbance associated with falling asleep could occur if the exterior noise levels exceed 52 dBA (with windows open) and 64 dBA (with windows closed), based on the conservative EPA lower range of 40 dBA.

As provided in Table 3.13-26, included in Section 3.13, Noise, of the Draft EIR, the cumulative operational noise impacts associated with noise from stations, towers, queuing, and cabins would result in less than significant impacts. Provided in Table 2 below are nighttime composite noise levels developed based on Table 3.13-23, LAMC Operational Noise Impact Analysis, and Table 3.13-25, Proposed Gondola Cabin Noise, included in Section 3.13. The subset of Noise Sensitive Receptors provided

[40] United States Environmental Protection Agency (USEPA/EPA). 1981. Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/9100OOAJ.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C81thru85%5CTxt%5C00000018%5C9100OOAJ.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.

[41] *Id*., p. 6-2.

[42] United States Environmental Protection Agency (USEPA/EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.The noise reduction for building in warm climate was selected as a conservative analysis, as the noise reduction for building for cold climate is higher, i.e., 12 dB for warm climate and 17 dB for cold climate.

below were conservatively selected as those most likely to be impacted by the cabins either because of the distance from the Noise Sensitive Receptors to the cabin or the existing nighttime noise levels. Impacts at all other Noise Sensitive Receptors would be less than those provided in Table 2 below.

As provided in Table 2 below, the composite estimated noise levels at the interior of the off-site noise sensitive receptors would be below both the EPA lower range of 40 dBA noise level for falling asleep, as well as the 70 dBA noise level for awakening, with the windows closed. With the windows open, the estimated interior noise levels would be below the EPA lower range 40 dBA at all Noise Sensitive Receptors except NSR-3 (Mozaic Apartments) and NSR-8 (Future Residential Development), which would fall within the noise levels of 40 to 50 dBA, which the EPA has identified could result in difficulty in falling asleep for some people. However, as indicated in Table 2, the estimated noise levels at NSR-3 (Mozaic Apartments) and NSR-8 (Future Residential Development) would be well below the existing nighttime ambient noise levels. Therefore, the noise levels from the proposed Project would not result in any measurable noise increase at NSR-3 (Mozaic Apartments) and NSR-8 (Future Residential Development) and therefore it is not anticipated that the noise levels from the proposed Project would result in any sleep disturbance associated with falling asleep. Therefore, based on the EPA guidance, the proposed Project would have a less than significant impact on sleep disturbance.

Table 2 – Nighttime Estimated Gondola Noise Levels at the Interior of Off-Site Noise Sensitive Receptors

Noise Sensitive Receptor[a]	Nighttime Ambient Noise Levels[b] dBA L_{eq} A	Nighttime Gondola System Operation Noise Levels[c] dBA L_{eq} B	Gondola Cabin Noise Levels[d] dBA L_{eq} C	Composite Nighttime Noise Levels dBA L_{eq} D=B+C	Building Noise Reduction with Windows Open/Windows Closed dBA L_{eq} E	Estimated Noise Levels Inside the Building during Nighttime Hours with Windows Open/ Windows Closed[e] dBA L_{eq} D-E
NSR-3	65.5	55.3	41.2	55.5	12.0/24.0	43.5/31.5
NSR-5	64.9	46.4	33.9	46.6	12.0/24.0	34.6/22.6
NSR-6	64.1	41.4	36.6	42.6	12.0/24.0	30.6/18.6
NSR-7	65.1	40.5	33.1	41.2	12.0/24.0	29.2/17.2
NSR-8	64.4	53.8	43.4	54.2	12.0/24.0	42.2/30.2
NSR-9	56.5	45.0	29.0	45.1	12.0/24.0	33.1/21.1
NSR-13S	63.6	41.7	30.7	42.0	12.0/24.0	30.0/18.0
NSR-14S	55.2	50.5	33.1	50.6	12.0/24.0	38.6/26.6
NSR-17N	51.2	50.8	41.2	51.3	12.0/24.0	39.3/27.3

Notes:

[a] *The NSRs included in this evaluation were conservatively selected as those most likely to be impacted by the cabins either because of the distance from the NSR to the cabin or the existing nighttime noise levels. Impacts at all other NSRs would be less than those analyzed here.*

[b] *Source: Draft EIR Table 3.13-11*

[c] *Source: Draft EIR Table 3.13-23, nighttime operation.*

[d] *Source: Draft EIR Table 3.13-25*

[e] *Estimated noise levels due to project operation only and do not include existing ambient noise levels.*

In addition, and as discussed in Response GO17-129, a noise analysis was conducted to evaluate potential sleep disturbance using the Sound Exposure Level (SEL) acoustic metric, which evaluates single event noise levels. SEL represents the total acoustic energy of an individual noise event as if that event has occurred within a one-second time period. SEL captures both the level (magnitude) and the duration of a sound event in a single numerical quantity, by summing all the noise energy from an event into one second. For the proposed Project the SEL analysis is designed to address potential sleep disturbance due to individual cabins passing by. An SEL analysis with respect to potential sleep disturbance is mainly used for aviation related noise sources and there are currently no noise standards, or limits, to address gondola noise impacts on sleep (sleep disturbance) using SEL. Accordingly, the SEL noise threshold from the LAX South Airfield Improvement Project EIR (LAX EIR)[43] was used to evaluate potential sleep disturbance for the proposed Project. The LAX EIR provided that a noise impact would occur when an aircraft single event would produce levels at or above 81 dBA SEL inside a residence.[44] Table 3 below provides the estimated SEL at the interior of the off-site noise sensitive receptors due to a cabin passing, with windows open and closed. As indicated in Table 3, the maximum estimated SEL inside a noise sensitive use due to the cabin passing by would be 57.1 dBA (SEL) with window open and 45.1 dBA (SEL) with window closed at NSR-3 (Mozaic Apartments), which would be well below the 81 dBA (SEL) interior noise limits. Therefore, based on the SEL metric, noise from the proposed Project would have a less than significant impact on sleep disturbance.

Table 3 – Estimated Project SEL Noise Levels at the Interior of Off-Site Noise Sensitive Receptors

Noise Sensitive Receptor	Estimated Noise Levels Inside the Building with Windows Open/ Windows Closed, dBA (L_{eq})	Estimated SEL inside the building Due to Gondola Operation with Windows Open/ Windows Closed,[a] dBA (SEL)	Interior Noise Threshold for Sleep Disturbance, dBA (SEL)
NSR-3	43.5/31.5	57.1/45.1	81.0
NSR-5	34.6/22.6	48.3/36.3	81.0

[43] City of Los Angeles. 2005. South Airfield Improvement Project Project-Level Tiered Draft Environmental Impact Report (DEIR). Available at: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/south-airfield-improvement-project. Accessed August 2023.

[44] *Id*. at IV-154. LAX Project EIR, although the Berkeley Jets ruling directed that the significance of single event noise effects be addressed in an EIR for aviation related noise, the Court of Appeal noted that the CEQA Guidelines adopt site-sensitive thresholds of significance for noise, recognizing that "[a]n ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting." (*Berkeley Keep Jets over the Bay Committee v. Bd. of Port Commissioners* (2001) 111 Cal.Rptr.2d 598, 625-626 [citation omitted]).

NSR-6	30.6/18.6	44.3/32.3	81.0
NSR-7	29.2/17.2	42.8/40.8	81.0
NSR-8	42.2/30.2	55.8/43.8	81.0
NSR-9	33.1/21.1	46.7/34.7	81.0
NSR-13S	30.0/18.0	43.6/31.6	81.0
NSR-14S	38.6/6.6	52.2/40.2	81.0
NSR-17N	39.3/27.3	52.9/40.9	81.0

Notes:

[a] *SEL was calculated based on a 23-second cabin headway.[12] SEL = L_{eq} + 10*log(duration in seconds), for example, SEL at NSR 3 = 43.5 + 10*log(23) = 57.1.*

Comment GO17-131 5. The DEIR Fails to Disclose Conflicts with the Los Angeles Municipal Code Noise Regulations.

Section 111.00 of the Los Angeles Municipal Code states, "[i]t is hereby declared to be the policy of the City to prohibit unnecessary, excessive and annoying noises from all sources subject to its police power. At certain levels noises are detrimental to the health and welfare of the citizenry and in the public interests shall be systematically proscribed." (Emphasis added.) Despite this strong policy, the Project will have significant impacts related to construction noise. If Metro were to approve the Project without mitigating these noise impacts, the Project would certainly run counter to this policy.

Response GO17-131 This comment provides a general recitation and characterization of the Los Angeles Municipal Code. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, on-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation, and off-site construction traffic noise impacts would be less than significant during all phase of construction of the proposed Project, operational noise impacts would be less than significant. Section 3.13 includes an analysis of the construction noise impacts using the LAMC Noise Regulations under LAMC Section 112.05 which establishes that a maximum allowable noise level for construction equipment within 500 feet of any residential zone is 75 dBA when measured at 50 feet from the noise source. As discussed on pages. 3.13-49 to 3.13-50 and 3.13.73 of the Draft EIR, under the LAMC analysis, with implementation of Mitigation Measure NOI-A, construction equipment would generate noise greater than 75 dBA at a distance of 50 feet resulting in significant and unavoidable impact for all construction phases. The noise levels generated at specific sensitive receptors by construction phase with mitigation measures are provided in Table 3.13-17. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management

Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include noise barriers discussed in detail at Response G017-125. Section 3.13, Noise, of the Draft EIR, also includes an analysis of the operational noise impacts using the LAMC Noise Regulations as discussed on page 3.13-53, and Table 3.13-23 on page 3.13-55. As demonstrated on Table 3.13-23, under the LAMC analysis using the worst-case scenario, the proposed Project operations would not result in noise levels above the applicable LAMC thresholds, and impacts would be less than significant. Consistent with CEQA Guidelines section 15162.4, the Draft EIR considered and imposed all feasible mitigation, and CEQA does not require the discussion of ineffective or infeasible mitigation measures.

Comment GO17-132 6. The DEIR Fails to Implement All Feasible Mitigation for Construction Impacts.

The DEIR is required to consider and adopt all feasible mitigation measures. (King & Gardiner Farms, LLC v. County of Kern (2020) 45 Cal.App.5th 814, 852, 866, 869.) The following mitigation measures must be considered:

- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Limiting operation hours to daytime hours on weekdays.
- Replacing gas- and diesel-powered equipment with electric equipment to reduce the noise impacts associated with operation of that equipment.

Response GO17-132 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. As discussed on page 2-51 in Section 2.0, Project Description, of the Draft EIR, construction activities would be consistent with the City's allowable construction hours of Monday through Friday between 7:00 a.m. to 9:00 p.m. and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m. As noted on page 3.13-71 in Section 3.13, Mitigation Measure NOI-A requires, in part, the following:

- **Equipment Maintenance**: Construction equipment shall be properly maintained per manufacturer's specifications to prevent noise due to worn or improperly maintained parts and shall be fitted with the best available noise suppression devices (i.e., mufflers, lagging, and/or motor enclosures). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.

- **Electrical Sources**: When possible, on-site electrical sources shall be used to power equipment rather than diesel generators.
- **Sensitive Uses**: Fixed and/or stationary equipment (e.g., generators, compressors, concrete mixers) shall be located away from noise-sensitive receptors.

Therefore, the mitigation suggested in the comment was evaluated and incorporated into the proposed Project to the maximum extent feasible. With implementation of Mitigation Measure NOI-A, construction noise has been minimized to the maximum extent feasible. No additional feasible mitigation measures are required, and this comment does not raise any feasible mitigation measures that are considerably different from those already analyzed in the Draft EIR.

Comment GO17-133 G. The Potential for Blight Is Not Sufficiently Analyzed.

The DEIR was required to analyze the potential for the creation of blight. In reviewing the sufficiency of two EIRs for shopping center projects in Bakersfield, a court stated:

> [E]xperts are now warning about land use decisions that cause a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake. . . . . We . . . agree that CEQA requires analysis of the shopping centers' individual and cumulative potential to indirectly cause urban decay.
>
> (Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1204.)

ARTT has committed only to funding the environmental review portion of the gondola project.

What happens if the gondola is constructed but there is insufficient funding for operations and maintenance of the gondola?

The possibility that the gondola would be left standing idle, thus contributing to blight must be addressed. For example, a bond should be required to be posted for removal of gondola equipment in the same way mine operators are required to post cleanup bonds to ensure their operations are not abandoned and thrown upon the public to be cleaned up.

Response GO17-133 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. CEQA does not require speculation as to possible future environmental consequences, such as the potential that the

proposed Project would not continue operations, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment GO17-134 H. Land Use and Planning Impacts (Section 3.11) Will Be Significant But are Not Acknowledged.

1. City of Los Angeles General Plan Conflicts.

The City of Los Angeles will not be able to approve requested entitlements because they conflict with various policies of the City of Los Angeles General Plan. The EIR identifies the Los Angeles General Plan (EIR, p. 3.11-5) but fails to identify the conflicts with this plan. The proposed Project impermissibly conflicts with General Plan policies. State law requires that, because a general plan is the "constitution" for the City's future development, any decision affecting land use and development must be consistent with the General Plan. (Citizens of Goleta Valley v. Board of Supervisors, supra, 52 Cal.3d at 570-71 ["[T]he propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements."].) As the "'constitution for future development' . . . [the General Plan is] 'located at the top of 'the hierarchy of local government law regulating land use' . . ." (DeVita v. Napa (1995) 9 Cal.4th 763, 773.) A General Plan is more than an "exhortation", it is a "commandment." (Debottari v. City of Norco (1985) 171 Cal.App.3d 1204, 1211.) "[T]he requirement of consistency is the linchpin of California's land use and development laws. It is the principle which infused the concept of planned growth with the force of law." (Id. at 1213.)

Response GO17-134 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the City of Los Angeles' General Plan. This comment does not specify what City of Los Angeles General Plan policies the commenter believes the proposed Project is in conflict with, and no further response is warranted. This comment otherwise provides a general recitation and characterization of CEQA case law.

Comment GO17-135 The Project would also be built on or cross over land that is within the Alameda District Specific Plan, the Central City North Community Plan, the DTLA Community Plan (current or updated), the Central City North Specific Plan, the Silver Lake-Echo Park-Elysian Valley Community Plan, and the Chinatown Redevelopment Plan (DEIR, pp. 3.11-8 through 3.11-1313), and the City of Los Angeles will be responsible for ensuring compliance by the Project with each such plan. For example, the City would have to waive provisions of the River Implementation Overlay District to allow the construction and operation of the Alameda and Alpine Towers and waive provisions of the Cornfield/Arroyo Seco Specific Plan to allow construction and operation of the Chinatown Station. (DEIR, p. 2-62.) However, there is no indication that the City would be amenable to such waivers. Therefore, these conflicts must be identified as significant and avoided.

Footnote 13: See, particularly, the map at DEIR, p.3.11-8, showing only some of the varied plans and requirements to which the Project would be subject. Metro does not have the authority and expertise to evaluate and balance the requirements of all these plans, and the other plans described above, with respect to the Project. The City does.

Response GO17-135 Refer to Response GO17-42 for a discussion of the proposed Project's land use consistency analysis and consultation with responsible agencies, including the City of Los Angeles.

Comment GO17-136 While CEQA permits a responsible agency to rely on a lead agency's CEQA document, the City of Los Angeles and other responsible agencies must comply with CEQA "by considering the EIR or negative declaration prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved." (14 CCR § 15096(a).) The City of Los Angeles will retain responsibility for mitigating or avoiding the direct or indirect environmental impacts of the portions of the project that it approves. (14 CCR § 15096(g)(1).)

The EIR may not assume that the City of Los Angeles will waive these conflicts or override these policies. Therefore, the EIR must analyze these as significant impacts within the jurisdiction of another agency.

Response GO17-136 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response GO17-42 for a discussion of the proposed Project's land use consistency analysis and consultation with responsible agencies, including the City of Los Angeles. As the lead agency, Metro is required to assume that the proposed Project would be approved, constructed, and operational in drafting the EIR. Refer to Section 2.0, Project Description, for a list of the land use approvals that may be required for implementation of the proposed Project. These approvals are included in the proposed Project Description, and therefore Metro properly analyzed the proposed Project's environmental impacts as if the proposed Project would be approved by all applicable agencies, inclusive of these approvals.

Comment GO17-137 2. The Surplus Land Act Requires Primary Consideration of Affordable Housing, Education, and Recreation Before Private Development.

Metro and the City of Los Angeles must comply with the Surplus Lands Act (SLA) in any potential disposition of publicly owned land. The Department of Housing and Community Development (HCD) has stated the SLA (Government Code sections 54220-54234) "is a 'right of first refusal' law that requires all local agencies to offer surplus land for sale or lease to affordable home developers and certain other entities before selling or leasing the land to any other individual or entity…. Any time a local agency disposes of land, it must follow the SLA unless the land qualifies as exempt surplus land. Dispositions include both sales and leases." All dispositions of surplus land must be approved by HCD before the sale or lease can be finalized. (Gov. Code, § 54230.5, subd. (b)(1).)

HCD is not listed among agencies where approval is required, but it should be. It should have been consulted as a Responsible Agency.

Response GO17-137 This comment provides a provides a general recitation and characterization of the California statutes, case law, and regulations. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of the Surplus Land Act. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the proposed Project's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. HCD is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. (Public Resources Code § 21069.)

Comment GO17-138 3. Use of the Union Station Forecourt Would Conflict with the Union Station Master Plan.

The EIR Land Use section (Section 3.11) completely fails to identify the Los Angeles Union Station Master Plan. See https://www.laconservancy.org/issues/union-station-master-plan. This Master Plan "encompasses approximately 38 acres, including the 161,000 square-foot terminal building, outdoor patios, and railroad tracks. In 1996, the approved Alameda District Specific Plan established development rights that now allow Metro to build up to 5.9 million square feet of new construction." (Ibid.) "In 2018, Metro released its Final Environmental Impact Report and its Final Environmental Impact Statement in 2020 for the Union Station Master Plan. Construction of the future high-speed rail concourse, planned to begin at the end of the decade, will occur at the rear of the property without significant adverse impacts to the historic train station. The Los Angeles Conservancy has advocated for preserving Union Station's integrity since 1995 and was involved with the current Master Plan process."

As identified in the Los Angeles Union Station Historical Society letter sent to Metro on November 22, 2022, which we incorporate by reference, ARTT's "proposed 'futuristic-style' Union Station Terminal on Alameda Street and LA Metro's supporting 'Esplanade' project will blight the historic and architecturally significant west façade of Union Station…"

Response GO17-138 This comment incorporates by reference Comment Letter GO4. Refer to Letter GO4 for responses to that letter. Refer to Section 2.3.2, Los Angeles Union Station, of Section 2.0, Project Description, of the Draft EIR, for discussion of the LAUS Master

Plan, including its programmatic goals for LAUS and the proposed development of the LAUS Forecourt and Esplanade Improvements Project. Refer to Section 3.11.3, Environmental Impacts, and Tables 3.11-1 through 3.11-6 of the Draft EIR, for discussion of the proposed Project's consistency with applicable land use plans, policies, and regulations. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment GO17-139 4. The Discussion of the Conditional Use Permit Modification for Dodger Stadium is Uninformative.

The CUP for Dodger Stadium will have to modified. The EIR mentions the CUP, but no copy is provided nor sufficient information about its current baseline requirements, such as how many parking spaces are required to be provided, is given.

Response GO17-139 Refer to Section 2.10, Required Permits and Approvals, and Section 3.11, Land Use and Planning, of the Draft EIR, noting that, pursuant to LAMC Section 12.24.M, the Project Sponsor may seek a Plan Approval for the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow Stadium Tower and Dodger Stadium Station to implement the proposed Project. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events." Refer to pages 3.11-17 through 3.11-18, of Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the CUP's requirements, including that "'automobile parking facilities for a minimum of one (1) automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on site', so a total of 15,556 parking spaces must be provided and maintained on site. There are currently a total of 18,889 parking spaces provided and maintained on site." An analysis of the proposed Project's consistency with the CUP and the CUP's requirements (including how a total of 18,889 parking spaces are currently provided on the site, and a total of 15,556 are required to be provided under the CUP) is provided on page 3.11-43. The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. In addition, the CUP, which is referenced in Section 3.11, Land Use and Planning, of the Draft EIR, was provided on the proposed Project's SB 44 website under the 3.11 Land Use Category concurrently with the release of the Draft EIR on October 17, 2022.[45]

Comment GO17-140 5. The Park Preservation Act Requires Replacement Land.

[45] City of Los Angeles Department of City Planning Office of Zoning Administrator. 1960. Z.A. Case No. 15430. Dodger Baseball Stadium Site – Chavez Ravine Area (Dodger Stadium Conditional Use Permit).

The Park Preservation Act- which is not mentioned in the EIR-requires the replacement of land that is taken from park use. Any land used by the Project that is part of the State Historic Park must be replaced with parkland elsewhere.

Response GO17-140 Refer to Topical Response F, Los Angeles State Historic Park for a discussion of the Public Park Preservation Act.

Comment GO17-141 6. Metro's Identification of Possible Federal and State Funding Makes Federal Requirements Relevant and Applicable, but the EIR Fails to Discuss Them.

Metro has placed the gondola project on its comprehensive list of projects to consider for state and federal funding for the Olympics. (http://metro.legistar1.com/metro/attachments/b8e94467-6e56-4687-b2bc-3d0bb08fb2fa.pdf, page 5).) If federal funding is sought for the gondola, Metro must comply with federal requirements, many of which are relevant and would prevent approval of the Project.

Furthermore, federal funding requires compliance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act, including requirements for section 106 consultation for impacts to historic resources, and compliance with section 4(f) of the Department of Transportation Act, which prohibits usage of historic property or park land for transportation projects. Metro must also comply with the Civil Rights Act, which prohibits approval of projects that have discriminatory impacts. Metro must also comply with California's Government Code section 11135.[14]

Section 4(f) of the Department of Transportation (DOT) Act is one of the most stringent federal environmental and historic preservation statutes ever enacted by Congress. The statute explicitly prohibits the Secretary of Transportation from approving any project that requires the "use" of historic sites, unless (1) there is no "prudent and feasible" alternative to the use of the sites, and (2) "all possible planning" has been taken to minimize harm to the sites. (28 U.S.C. § 138; 49 U.S.C. § 303(c).) Section 4(f) imposes a substantive constraint on the exercise of agency discretion. Section 4(f) operates as a "plain and explicit bar to the use of federal funds" for transportation projects that would use historic sites or parkland; "only the most unusual situations are exempted." (Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402, 411 (1972).) Indeed, the language of Section 4(f) shows that Congress intended the protection of historic sites and parkland to be given "paramount importance" in the planning of transportation projects. (Id. at 412-13.)

Footnote 14: 14 Government Code section 11135 provides:

> "(a) No person in the State of California shall, on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, or sexual orientation, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or

activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state."

The gondola Project would disparately impact the communities along the gondola route so its unavoidable impacts may not be overridden and approved without violating section 11135.

Response GO17-141 This comment provides a general recitation and characterization of the statutes and regulations. At Metro's November 16, 2022 Ad Hoc Olympics Planning Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A). [46] The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A). As proposed, the proposed Project does not require Federal review, including under the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Nevertheless, the Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project. As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. And, as discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Further, the proposed Project would comply with Government Code section 11135, as applicable.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project supports Metro's goal of prioritizing equity opportunities, and helps promote public

[46] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

transit as an essential lever in enabling access and improving quality of life for Los Angeles County. Further, the Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and the proposed Project is consistent with General Plan policies related to environmental justice, including by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements, and by ensuring quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. In addition, public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. No displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

Comment GO17-142 Metro should prepare a combined EIR/EIS to satisfy both state and federal environmental review requirements. Such and EIR/EIS could potentially be used for federal approvals that are or become necessary such as a federal conformity determination by EPA (the Project must be consistent with the Regional Transportation Plan), an approval of non-interference with airport traffic by FAA (the LAUSHS has asserted the Project is within close proximity of a heliport which is considered an airport for purposes of FAA review), or a determination of absence of impacts to historic/cultural properties of federal significance.

Additionally, stakeholders in the National Historic Preservation Act section 106 process such as the Los Angeles Union Station Historic Society (LAUSHS) must be identified and coordinated with to avoid section 106 impacts.

Response GO17-142 As proposed, the proposed Project does not require Federal review, including under the National Environmental Policy Act (NEPA) or Section 106 of the National Historic Preservation Act (NHPA). The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and Appendix O, Airspace Analysis Technical Memo. The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com, the Hooper Heliport is a city-owned, *private use* facility. As a private use facility, it does not meet the "*public* use airport" description in the CEQA threshold of significance for this issue included in Section 3.09, Hazards and Hazardous Materials, under Impact HAZ-5. Refer to Draft EIR Appendix O, Airspace Analysis Technical Memo. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Airspace Analysis Comment Response for the Los Angeles Aerial Rapid Transit Project, of the Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project. Refer to Response GO17-143 for further discussion of the National Historic Preservation Act.

Comment GO17-143 Under the National Historic Preservation Act, a project may not be approved if feasible alternatives will avoid historic resource impacts.

Response GO17-143 As proposed, the proposed Project does not require Federal review, including under Section 106 of the National Historic Preservation Act (NHPA). NHPA Section 106 requires a federal agency to take into account the effect of its undertaking on historic properties prior to the federal agency action at issue, s*ee* 54 U.S.C. § 306108, which is implemented through the Section 106 consultation process as provided in 36 C.F.R. Part 800. The NHPA does not require absolute avoidance of impacts to historic properties based on consideration of feasible alternatives. Nevertheless, the Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment GO17-144 The National Historic Preservation Act (NHPA) states the policy of the United States is to "provide leadership in the preservation of the historic property of the United States." (54 U.S.C.A. § 300101.) Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The four-step Section 106 review process set forth in the ACHP's regulations, "Protection of Historic Properties" (36 CFR Part 800) outlines a four-step process that ensures that the federal agency considers effects, including: (1) establishing the undertaking, (2) identifying and evaluating historic properties, (3) assessing effects, and (4) resolving any adverse effects. These steps are to be carried out sequentially and ensure that consulting parties consider alternatives to avoid adverse effects on historic properties. Consultation with all consulting parties is necessary to develop avoidance alternatives.

Response GO17-144 Refer to Response GO17-143 for discussion of the NHPA.

Comment GO17-145 Section 4(f) of the Department of Transportation (DOT) Act is one of the most stringent federal environmental and historic preservation statutes ever enacted by Congress. The statute explicitly prohibits the Secretary of Transportation from approving any project that requires the "use" of historic sites, unless (1) there is no "prudent and feasible" alternative to the use of the sites, and (2) "all possible planning" has been taken to minimize harm to the sites. (28 U.S.C. § 138; 49 U.S.C. §303(c).) Section 4(f) imposes a substantive constraint on the exercise of agency discretion. Section 4(f) operates as a "plain and explicit bar to the use of federal funds" for transportation projects that would use historic sites; "only the most unusual situations are exempted." (Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402, 411 (1972).) Indeed, the language of Section 4(f) shows that Congress intended the protection of historic sites to be given "paramount importance" in the planning of transportation projects. (Id. at 412-13.)

The circumstances under which an avoidance alternative can be rejected as not "feasible and prudent" have been very narrowly defined by the Supreme Court in the Overton Park case. The Secretary is not permitted to "engage in a wide-ranging balancing of competing interests." (Id. at 413.) An avoidance alternative is "infeasible" only if it cannot be built "as a matter of sound engineering." (Id. at 411.) And in order to find an avoidance alternative "not prudent" under Section 4(f), the Secretary must find that "truly unusual factors" are present, or that "alternative routes present unique problems," or that the "cost or community disruption" resulting from the avoidance alternative would reach "extraordinary magnitudes." (Id.) Without such a showing, even the asserted "need" for the project cannot suffice to rule out alternatives that would avoid using protected sites. (See Stop H-3 Ass'n v. Dole, 740 F.2d 1442, 1450-58 (9th Cir. 1984), cert. denied, 471 U.S. 1108 (1985).)

Code of Federal Regulations Title 23 section §774.3 regarding Section 4(f) approvals states:

> The Administration may not approve the use, as defined in §774.17, of Section 4(f) property unless a determination is made under paragraph (a) or (b) of this section.
>
> (a) The Administration determines that:
>
> (1) There is no feasible and prudent avoidance alternative, as defined in §774.17, to the use of land from the property; and (2) The action includes all possible planning, as defined in §774.17, to minimize harm to the property resulting from such use; (23 C.F.R. §774.3.)

As courts have explained the historic review process created by NHPA and its implementing regulations:

> Under NHPA, a federal agency must make a reasonable and good faith effort to identify historic properties, 36 C.F.R. § 800.4(b); determine whether identified properties are eligible for listing on the National Register based on criteria in 36 C.F.R. § 60.4; assess the effects of the undertaking on any eligible historic properties found, 36 C.F .R. §§ 800.4(c), 800.5, 800.9(a); determine whether the effect will be adverse, 36 C.F.R. §§ 800.5(c), 800.9(b); and avoid or mitigate any adverse effects, 36 C.F.R. §§ 800.8(e), 800.9(c).

(Muckleshoot Indian Tribe v. U.S. Forest Service (9th Cir. 1999) 177 F.3d 800, 805.)

Therefore, prioritizing avoidance of impacts to historic properties is not only a regulatory requirement but a statutory requirement of NHPA and Section 4(f).

Response GO17-145 This comment provides a general recitation and characterization of federal statutes, case law, and regulations. Refer to Response GO17-141 for a discussion of how as proposed, the proposed Project does not require Federal review, including under the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act.

Comment GO17-146 7. Approval from the PUC is Needed.

ARTT has apparently taken the position that PUC approval is not needed. The gondola project crosses over the Gold Line in two places- near the Alpine Tower and near the State Historic Park. The Public Utilities Commission (PUC) would be a responsible agency because the Project would cross over and above railroad tracks. Thus, PUC review and approvals are required, with proper public notice and full public hearing processes must be provided.

Response GO17-146 Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of responsible agencies identified for the proposed Project. The Public Utilities Commission ("CPUC") is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or

approving the proposed Project and does not have discretionary authority related to the proposed Project.

Comment GO17-147 I. Geology and Soils (Section 3.7) is Inadequate in its Analysis.

The EIR states that the project and stations and towers "would be in an area mapped as potentially subject to liquefaction." (EIR, p. 3.7-17.) The mitigation for this is adherence to emergency plan protocols but that is inadequate in an earthquake zone.

This is important to TCE as portions of the Project, with its multi-ton gondola cars suspended on wires on a proposed tower the Alameda triangle adjacent to TCE, could buckle during an earthquake—placing the lives of passengers and TCE office staff, grantees, and visitors in danger.

Response GO17-147 Refer to Section 3.07, Geology and Soils, with supporting data provided in Appendix I, Geotechnical Document in Support of the Environmental Impact Report, for a discussion of how the proposed Project's potential impacts in relation to existing geology, soils, and seismic conditions in the proposed Project study area would be less than significant with mitigation. The proposed Project would be constructed in accordance with applicable standards, requirements, and building codes, which would ensure structural integrity and safe construction. Mitigation Measure GEO-A would require the development of a site-specific geotechnical investigation and report. The geotechnical investigation and report would include geotechnical recommendations for project design and construction based on grading conditions and foundation capacities, including an evaluation of risk of settlement in the fill, subsidence, and liquefaction. Additionally, the geotechnical report would include recommended measures such as site stabilization to reduce potential impacts related to expansive soils and soil corrosivity, subsidence, liquefaction, differential settlement, slope instability, or other potential ground failures induced by the proposed Project. With compliance to existing standards and codes and implementation of Mitigation Measure GEO-A, impacts related to unstable soils, landslides, lateral spreading, subsidence, liquefaction, or collapse during construction of the proposed Project would be reduced to less than significant. Refer to Appendix F, Memo on Structural Engineering, for a discussion of how advanced computer analysis modeling has been used in developing the structural concepts and will be further employed along with advanced site-specific ground motions earthquake simulations to verify that the safety standards are met.

Comment GO17-148 J. The Analysis of Alternatives (Section 4.0) is Grossly Inadequate.

The EIR admits that the environmentally superior alternative is the Transportation Systems Management Alternative. (EIR, p. 4-75 to 4-76.) However, the EIR than asserts that it would create more Vehicle Miles Traveled and not provide the same level of benefits. (EIR, p. 4-75.) The Transportation Systems Management Alternative can be augmented to reduce Vehicle Miles Traveled and to provide the benefits that would allegedly be lost. The Dodger Express bus fleet could be expanded and

converted to electric buses with more pickup and dropoff locations throughout the County and near the Stadium such as at the Los Angeles Zoo.

Response GO17-148 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment GO17-149 1. The Project Cannot be Approved if There Are Feasible Alternatives that Would Reduce Adverse Impacts.

CEQA prohibits approval of projects with adverse environmental impacts if there are feasible alternatives. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) The CEQA Guidelines require an agency to "Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved." In order to implement this policy, the Guidelines specify that:

> A public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:
>
> (a) There is no feasible way to lessen or avoid the significant effect..."

(Guidelines § 15043, emphasis added.) More specifically, the Guidelines provide:

> If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.

(Guidelines § 15126.6(f)(2)(B).)

Response GO17-149 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not raise a substantive issue on the content of the Draft EIR. This comment suggests that CEQA requires the denial of a project if there are alternatives available. CEQA is not so rigid. Under CEQA, an agency must consider a "reasonable range" of potentially feasible alternatives to a project, or to the project's location, "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines § 15126.6(a); see also *id*., § 13053.5(a).) The CEQA Guidelines also provide several factors a lead agency may consider regarding the feasibility of an alternative, including "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." (CEQA Guidelines § 15126.6(d).) Further, CEQA allows a lead agency to exercise its discretion to decline to analyze an alternative if the alternative is "infeasible" or if it would fail to "meet most of the basic project objectives." (See, e.g., CEQA Guidelines § 15126.6(c).) Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. In addition, the Draft EIR identifies feasible mitigation measures to substantially lessen identified significant environmental impacts from the proposed Project, in compliance with CEQA's requirements. As discussed in Section 4.0, Alternatives, of the Draft EIR, on page 4-15, pursuant to CEQA Guidelines section 15126.6(f)(2), the Draft EIR considered three Direct Alignment Alternatives which included alternative locations for the proposed Project, but dismissed these alternatives from further detailed consideration because they would not avoid or substantially lessen significant effects of the proposed Project, would not otherwise meet the project objectives, and because the Project Sponsor would likely be unable to reasonable acquire, control, or otherwise have access to alternative sites required for the Direct Alignment Alternatives.

Comment GO17-150 2. A Reasonable Range of Alternatives Must Be Considered, and Was Not.

Metro has a duty under CEQA to evaluate a reasonable range of alternatives to the Project. (Laurel Heights I, supra, 47 Cal.3d at 400.) As the California Supreme Court has stated:

> Under CEQA, the public agency bears the burden of affirmatively demonstrating that . . . the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures.

(Mountain Lion Foundation v. Fish and Game Commission (1997) 16 Cal.4th 105, 134, emphasis added; accord Village Laguna of Laguna Beach v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is "the heart of CEQA" the "core of an EIR is the mitigation and alternatives sections." (Citizens of Goleta Valley v. Bd. Of Supervisors (1990) 52 Cal.3d 553, 564 ("Goleta II").) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA's substantive mandate to prevent significant avoidable damage to the environment when alternatives or mitigation measures are feasible. (Guidelines § 15002(a)(3).)

Response GO17-150 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Refer to Response GO17-149 for discussion of the alternatives considered in the Draft EIR and compliance with CEQA.

Comment GO17-151 3. Alternatives Proposed in the LACTC Study Were Summarily Rejected Without Valid Evidence.

Alternatives were raised in the Los Angeles County Transportation Commission (LACTC) study but are rejected as infeasible or not studied at all (EIR, p. 4-9), without substantial evidence to support those conclusions. Other alternatives are rejected for failing to meet the unduly specific and narrow Project objectives. When the public offers reasonable alternatives to the proposed Project, Metro should provide a meaningful analysis of them. (Pub. Res. Code § 21091(d)(2)(B); Guidelines § 15088(c); Berkeley Jets, supra, 91 Cal.App.4th at 1367.)

An EIR cannot define the Project objectives in a manner that essentially is limited to the proposed Project. Further, with the exception of the mandatory "no project" objective, the alternatives that are considered appear designed to be rejected.

While "An EIR need not consider every conceivable alternative to a project, 'it must consider 'a reasonable range of potentially feasible alternatives...'" (Guidelines § 15126.6(a), emphasis added.) "The range of feasible alternatives [for an EIR] shall be selected and discussed in a manner to foster meaningful public participation and

informed decision making." (Guidelines ' 15126.6 (f).) "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Guidelines § 15126.6(b).)

Response GO17-151 Refer to Response GO17-155 for a detailed response to the 1990 *Dodger Stadium Transit Access Study* prepared by Gruen Associates for the Los Angeles County Transportation Commission.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The proposed Project's objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree." (CEQA Guidelines, §15126.6(a)–(b).) The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, as required by CEQA, the alternatives analysis included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project. (See CEQA Guidelines § 15126.6(e).) CEQA also requires that an EIR identify one "environmentally superior alternative" from the range of reasonable alternatives that are evaluated; the "environmentally superior alternative" cannot be the "No Project"

alternative or the underlying project. The Draft EIR considered a "No Project Alternative," the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Evaluation of each of the alternatives included a description of the alternative, the environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area, and the environmental impacts of each alternative as compared to the proposed Project, followed by a general discussion of the extent to which the underlying purpose and project objectives are obtained by the alternative. Further, in compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Section 4.2.1 considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the basic project objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. In response to public comments, this alternative was considered but dismissed from further detailed analysis in the Final EIR because it did not meet most of the basic objectives of the proposed Project.

Comment GO17-152 4. The Environmentally Superior Alternative of Expanded Dodger Express Bus Usage is Feasible.

The EIR attempts to argue that most project objectives cannot be met through expanding Dodger Express bus service because of alleged difficulties with expanding bus service. (EIR, pp. 4-60 to 4-62.) This view is unsupportable. Alleged difficulties with expanding bus service can be overcome with flexible alternative locations rather than relying entirely on locations such as using Division 13 maintenance facility (p. 4-61) or Patsaouras Plaza and the West Portal (p. 4-60). Other sites for possible bus service connections should be identified and utilized. The Dodger Express bus already transports game attendees directly from the South Bay. Other service lines can be added.

Response GO17-152 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, of this Final EIR and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Refer to Response GO17-148 for additional discussion of expansion of the Dodger Stadium Express to remote locations.

Comment GO17-153 III. CONCLUSION.

Metro should reject the Project to focus resources on true public transportation such as electric bus service. If the Project is pursued it should be transferred to the City of Los Angeles for review.

The DEIR is so deficient that Metro must prepare a new DEIR and recirculate it for public and public agency comments if it wants to proceed with consideration of the Project.

Please notify us of any hearing or the issuance of any findings or permits related to this matter. We also ask that you preserve all records and communications related to development of any property related to the Project in accordance with the requirements of Golden Door Properties, LLC v. County of San Diego, (2020) 50 Cal.App.5th 467.

Sincerely,

Douglas P. Carstens

Response GO17-153 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments contained in this letter are provided above in Responses GO17-2 through GO17-152. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. Further, Metro will comply with the requirements of CEQA, including Public Resources Code Section 21168.6.9, which includes requirements for the content of the proposed Project's record of proceedings.

Comment GO17-154 Enclosure 5

Dear Mr. Carstens:

Tom Brohard, P.E., has reviewed the transportation portions of the October 2022 Draft Environmental Impact Report (Draft EIR) for the Los Angeles Aerial Rapid Transit (LAART) Project in the City of Los Angeles prepared by AECOM for the Los Angeles County Metropolitan Transportation Authority (Metro). The Proposed Project

includes a 1.2-mile aerial gondola system connecting Los Angeles Union Station (LAUS) and Dodger Stadium, with an intermediate station at the Los Angeles State Historic Park and Elysian Park. Sections of the Draft EIR which I have reviewed include:

- ES – Executive Summary
- Chapter 1 – Introduction
- Chapter 2 – Project Description
- Chapter 3.17 – Transportation
- Appendix A – NOP Scoping Report and Attachments
- Appendix N – Transportation Appendices

Various reports and documents relating to transportation improvements for Dodger Stadium as well as quantification of available parking in the area listed below have been reviewed and are enclosed as noted:

- August 1990 Dodger Stadium Access Study prepared by Gruen Associates for the Los Angeles County Transportation Commission
- September 15, 2022 Metro Executive Management Committee Report for Agenda Number 21 regarding the LAART Project
- October 24, 2022 UCLA Study Regarding the Proposed Project

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California, I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a brief summary of my experience in the enclosed resume.

Response GO17-154 This comment provides a general introduction to the comments raised in Enclosure 5 to Letter GO17. Responses to the comments contained in Enclosure 5 to Letter GO17 are provided below in Responses GO17-155 through GO17-185.

Comment GO17-155 Traffic and Transportation Issues

Based on the information in the October 2022 Draft Environmental Impact Report (Draft EIR) for the Los Angeles Aerial Rapid Transit (LAART) Project, and with consideration for the other various reports and documents related to access to and from Dodger Stadium, each of the following traffic and transportation issues must be fully addressed and evaluated further before Metro takes additional cation on the proposed Project:

1) Dodger Stadium Access Study

Over 30 years ago in August 1990, the Los Angeles County Transportation Commission, the County transportation agency that preceded Metro, retained Gruen Associates with Gannett Fleming to evaluate alternative connections to move people efficiently to and from Dodger Stadium. The enclosed "Dodger Stadium Access Study" evaluated various technologies including shuttle buses, automated guideway transit, light rail transit, gondola tramways, and walkways and escalators.

Six different characters were evaluated and compared for the five different technologies as shown in Table 1 of the Study. Table 3 compared boarding and travel time for the different alternatives, with the gondola tram taking an average of 92 minutes and 60-person shuttle buses taking about 43 minutes per passenger, less than half of the time required per passenger for the Gondola trams. The capacity of the shuttle bus system was estimated at 7,200 passengers per hours, over 2.5 times greater than what the gondola system could provide. The aerial gondola system was found to take more than twice as long as the shuttle buses, and shuttle buses were found to move more than double the number of people.

Of the different alternatives evaluated, the gondola was found to have the lowest capacity of any of the systems considered and would have the least positive impact on traffic and congestion. The gondola system then and now is more for sightseeing and entertainment and is not an effective way to move people between places that are 1.2 miles apart.

Response GO17-155 As described in Section 2.0, Project Description, of the Draft EIR, the two primary types of aerial transit used in urban environments are tramways and detachable gondolas. As shown in Table 1 of the 1990 *Dodger Stadium Transit Access Study* (1990 Study) referenced in the comment[47], the gondola technology evaluated in that study was a reversible tramway system consisting of two 125-passenger cars, similar to the Portland Aerial Tram in Portland, Oregon and the Roosevelt Island Tramway in New York, New York. An aerial tram system typically has two cabins that shuttle back and forth between two end terminals. The proposed Project is a detachable gondola system. An aerial gondola system includes multiple cabins that travel on a continuously circulating cable, which allows for an overall higher system capacity and ability to move more people per hour in each direction than an aerial tram. Furthermore, the proposed Project would be a modern 3S system with the capacity to move approximately 5,000 people per hour per direction with a travel time from LAUS to Dodger Stadium of seven minutes, far greater than the 2,800 persons per hour capacity estimated in the 1990 Study for the two-car reversible tramway system. As such, the two systems are not comparable, and findings in the 1990 Study comparing the tramway system to other modes as analyzed in that 33-year-old study are not relevant to the current proposed Project.

[47] Gruen Associates. 1990. Dodger Stadium Transit Access Study. Available at: https://libraryarchives.metro.net/dpgtl/lactc/dodger_stadium_access_study.pdf. Accessed August 2023.

Regarding the comment that a gondola system is not an effective way to move people between places that are 1.2 miles apart, similar modern 3S systems are in use for urban transit systems in a number of cities around the world including Koblenz, Germany, Phu Quoc, Vietnam, and Toulouse, France, across distances ranging from 0.55 to 1.67 miles (see Table 2-1 on page 2-4 in Section 2.0, Project Description of the Draft EIR). Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. The Draft EIR concluded that, even with a substantially increased Dodger Stadium Express bus capacity, the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between LAUS and the Metro Division 13 maintenance facility would render the Alternative substantially less competitive with driving time than the proposed Project, thus reducing its ridership potential compared to the proposed Project.

Comment GO17-156 2) Metro Board Executive Management Committee Report

The September 15, 2022 Metro Board Executive Management Committee Informational Report, Los Angeles Aerial Rapid Transit Project Update, discussed various topics including the traffic studies to be prepared for the Proposed Project. Page 4 states "A separate Project Access. Circulation and Construction Transportation Study will be prepared in accordance with the non-CEQA analysis required by the City of Los Angeles Transportation Assessment Guidelines. This separate technical report will evaluate the Project's potential effects on the intersection level of service."

This study was to be prepared as required and in accordance with the LADOT Transportation Assessment Guidelines issued in August 2022, including potential impacts on intersection level of service. The contents of the analysis are found in Section 3.3, Project Access Safety and Circulation Evaluation. This report was not included in the Draft EIR or Appendix N. Furthermore, this analysis has not been shared with the public or otherwise been made available for review and comment.

Response GO17-156 A report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment*[48] was prepared for the proposed Project in accordance with the LADOT *Transportation Assessment Guidelines* (TAG) and as stated in the Metro Board Executive Management Committee Informational Report. As set forth in the TAG, the Assessment includes non-CEQA transportation analysis related to access, circulation, construction, and cut through traffic.

[48] Fehr & Peers. 2022. Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment.

Since the Assessment addresses non-CEQA effects of the proposed Project, it is not required to be included in the Draft EIR. The Assessment was made available for public review in September 2022 on the proposed Project's SB 44 website, which is linked via Metro's LA ART website.

Comment GO17-157 3) Draft Environmental Impact Report – Executive Summary

a) The Project Purpose on Page ES-1 states "The proposed project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit service connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles state Historic Park, Elysian Park, and the surrounding communities via three new transit stations…The Proposed Project is needed to alleviate existing congestion and associated air pollution…as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways…"

Both of these statements, as well as many others throughout the Draft EIR, are made without foundation and/or documentation to support them in the Draft EIR or in the technical Appendices. They exaggerate even a best-case scenario that could most optimistically occur.

Response GO17-157 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Comment GO17-158 b) Page ES-16 provides a listing of comments from various public agencies. Interestingly enough, no comments are listed as being from the City of Los Angeles Department of Transportation. This lack of response from LADOT is unique in my extensive experience in my peer reviews of transportation aspects of various projects in the City of Los Angeles over the last several decades.

With direction from LADOT and as outlined in the LADOT Transportation Assessment Guidelines, a detailed Memorandum of Understanding outlining the methodology and approach to the transportation analysis is typically developed by the Draft EIR transportation consultant. This document is then reviewed, approved, and signed off by both LADOT and the Draft EIR transportation consultant before the transportation analysis begins. There is no evidence that such a Memorandum of Understanding was ever developed, reviewed and approved by both LADOT and by the Draft EIR transportation consultant.

Response GO17-158 This comment provides a general recitation and characterization of the Draft EIR. Pages ES-14 through ES-17 of the Draft EIR includes a Summary of Agency and Special District Comments in response to the Notice of Preparation (NOP) for the Draft EIR. As discussed in Section 1.0, Introduction, of the Draft EIR, the City of Los Angeles is a responsible agency under CEQA for the Draft EIR and, as discussed in Section 8.0, List of Preparers of the Draft EIR, was consulted during the preparation of the Draft EIR, including LADOT. Regarding LADOT, a Transportation Assessment Memorandum of Understanding ("MOU") was prepared and approved by LADOT in accordance with LADOT's procedures and *Transportation Assessment Guidelines*. The MOU is included as Appendix A to the report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment,* made available for public review in September 2022 on the proposed Project's SB 44 website, which is linked via Metro's LA ART website. In addition, LADOT issued a memorandum regarding the Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium on September 27, 2022, which is also linked via Metro's LA ART website.[49]

Comment GO17-159 c) Transportation Mitigation Measure TRA-A on Page ES-72 recommends "visibility enhancements for the Alameda Tower and Chinatown/State Park Station" but then states "visibility enhancement features could include high visibility crosswalk treatments, advance crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalks via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations."

The laundry list provided gives many different possible mitigation measures, but no study or analysis has been conducted to determine which may be appropriate or

[49] Los Angeles Department of Transportation. 2022. Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium.

inappropriate. For example, it is not possible to install traffic signals and all-way stops at the same intersection. The possible mitigation measures must be analyzed now to determine what is needed and warranted. Waiting until some future time to decide what will or will not be done constitutes deferred mitigation, and any such mitigation will not be timely or effective. Deferred mitigation is contrary to professional traffic engineering and transportation planning principles as well as CEQA, the California Environmental Quality Act.

Response GO17-159 Mitigation Measure TRA-A was originally written to permit flexibility in the ultimate measures to be taken prior to further development of the proposed Project design. However, the necessary mitigation at each location was further identified and is discussed on pages 3.17-41 and 3.17-42 in Section 3.17, Transportation, of the Draft EIR. As stated on page 3.17-41, the specific mitigation at the Alameda Tower is prohibiting right turns on red from westbound Alhambra Avenue to northbound Alameda Street. As stated on page 3.17-42, the specific mitigation at the Chinatown/State Park Station is channelization of pedestrians to the crosswalk where visibility is sufficient. In response to comments suggesting that Mitigation Measure TRA-A did not clearly define the visibility enhancements for the proposed Project, Mitigation Measure TRA-A has been revised to identify the necessary mitigation for each location, consistent with the analysis in the Draft EIR. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for revisions to Mitigation Measure TRA-A, identifying visibility enhancements the proposed Project would design during construction and complete prior to proposed Project operations at Alameda Tower and Chinatown/State Park Station. In addition, for consistency with best practices, the proposed Project has committed to implementing TRA-PDF-A, added to the final EIR, in Section 5.0, Corrections and Additions, to further enhance pedestrian visibility at the Chinatown/State Park Station. As described in TRA-PDF-A, the proposed Project would stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Comment GO17-160 d) Transportation Mitigation Measure TRA-B on Pages ES-73 to Page ES-76 provides more of the same deferred analyses in its discussion. The Construction Traffic Management Plan offers several possible measures but then defers to City of Los Angeles approvals before implementation. The City of Los Angeles always requires a Construction Traffic Management Plan and there is nothing special or unique here.

As one of several examples, “Existing yellow crossings…shall be evaluated in coordination with LADOT to determine if crossing guards should be assigned on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods… If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary.” Once again, possible mitigation measures are proposed but no measures are actually studied or planned.

The Draft EIR must analyze potential mitigation measures now and determine which are needed and warranted rather than publish yet another laundry list of possible measures which have not been studied or evaluated.

Response GO17-160 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for a discussion of how the use of plans in mitigation measures would not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. As the comment recognizes, it is true that the City of Los Angeles always requires a Construction Traffic Management Plan (CTMP); Mitigation Measure TRA-B requires exactly that. Such plans are routinely developed post-entitlement when projects are in design and such items as the potential to which construction may encroach into the public right-of-way, how long and what times of day that might occur, etc., become known. Accordingly, the CTMP would reflect the advanced project design and the current environmental conditions at the time of construction. Environmental impact reports for projects in the City of Los Angeles typically include development and implementation of a CTMP as either a mitigation measure or a project design feature, but the actual CTMP itself is not developed prior to nor included in the EIR. Mitigation Measure TRA-B in the Draft EIR is precisely in concert with the manner in which CTMPs are required for projects in the City of Los Angeles and provides a precise accounting of what actions may be included in the CTMP as well as performance standards that the CTMP is designed to achieve. It is not deferred mitigation.

Comment GO17-161 4) Draft Environmental Impact Report – Chapter 2 – Project Description

The Purpose and Need Section beginning on Page 2-10 states the Dodger Stadium Express buses carry approximately 1,850 riders on average per game. Page 2-12 states "Within two hours prior to the start and after a game or event at Dodger Stadium, more than 10,000 people could be transported to the stadium by the Proposed Project. The average attendance at a Dodger game was approximately 49,000 for the 2019 season. Given the capacity of the system, approximately 20 percent of the fans could take aerial transit connected to Metro's reginal transit system."

This statement is theoretical at best for conditions after a game since very few fans will be willing to wait more than one hour with other transportation options available including Dodger Express Bus as well as Uber/Lyft/Taxi. The UCLA Mobility Lab Study discussed further below found that the Proposed Gondola Project would carry only about 2,200 passengers at most and would transport only 1,380 people after a baseball game.

Response GO17-161 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for a detailed discussion of post-game/event transportation, including post-game/event ridership, wait times, and the proposed

Project versus other modes such as the Dodger Stadium Express, rideshare, and walking. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:[50,51]

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service. Further, as discussed in Topical Response B, the post-game/event queue for

[50] UCLA Mobility Lab. 2023. Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection. Available at: https://mobility-lab.seas.ucla.edu/. Accessed September 2023.

[51] UCLA Mobility Lab. 2023. Tweet on January 13, 2023. https://twitter.com/ucla_its/status/1613998706851971075?s=46&t=p_Kv02sYuM0ssXk0RDXWeA. Accessed September 2023.

the proposed Project would be constantly moving as cabins would depart every 23 seconds. Based on 2019 season data, there is an approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game. The proposed Project model assumed this same reduction for the post-game ridership estimates for the proposed Project. To be conservative, the full reduction of post-game ridership is assumed to shift to TNCs, which are estimated to generate more VMT than private vehicle trips due to the VMT generated by the driver traveling to the pick-up location at Dodger Stadium.

Comment GO17-162 b) The loading and unloading of gondola cars are briefly discussed on Page 2-17. However, there is no description or illustration of how passengers would access the gondola cars from the Metro L Line (Gold), how passengers would access the gondolas from ground level, or how passengers would cross Spring Street. Each of these omissions raises significant traffic safety concerns for pedestrians trying to reach and use the proposed gondola system.

Response GO17-162 The Metro L Line (Gold) Chinatown Station and the proposed Project's Chinatown/State Park Station will both be located on the west side of Spring Street north of College Street. As indicated on page 2-28 and on Figure 2-16 on page 2-31, in Section 2.0, Project Description, of the Draft EIR, passengers would walk between the Metro L Line and the proposed Project's Chinatown/State Park Station via a sidewalk along the west side of Spring Street and would not need to cross Spring Street. Moreover, the Project proposes pedestrian access enhancements, which could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating. As stated on page 2-28, in Section 2.0, Project Description, of the Draft EIR, "Access to the boarding platform would be from the mezzanine via elevators and stairs. Comprised of three levels, elevators and stairs from the ground level would lead up to a mezzanine, 27 feet above-grade, and ramps for the queuing area would lead up to the boarding platform." Refer to Section 5.0 Corrections and Additions for a discussion of how, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Comment GO17-163 c) Figure 2-27 on Page 2-54 illustrates the location of the proposed gondola support tower within the Alameda Triangle just south of Alhambra Avenue. From that illustration, it does not appear to be possible to provide adequate stopping sight distance through the tower supports for the westbound dedicated left turn lane and the westbound left turn/right turn lane. The Draft EIR must describe how potentially conflicting motorists will be able to see each other through the solid tower support framework.

Response GO17-163 An evaluation of sight distances at the intersection of Alameda Street and Alhambra Avenue with the Alameda Tower is provided on page 3.17-41, in Section 3.17, Transportation, of the Draft EIR. The Draft EIR concluded that impacts would be less than significant with implementation of the visibility enhancements described under Mitigation Measure TRA-A, by implementing a westbound no right turn on red restriction. This would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a westbound right turn on red. Refer to Response GO17-159 for a discussion of Mitigation Measure TRA-A.

Comment GO17-164 d) Page 2-61 does not indicate the requirements to coordinate with and obtain approval from LADOT during construction as well as during operation for the proposed project. The City of Los Angeles has jurisdiction over the roadways that will be impacted, and the Proposed Project must work closely with the City's Department of Transportation by obtaining all required permits and following each of the permit requirements.

Response GO17-164 As detailed in Section 3.17, Transportation of the Draft EIR, Mitigation Measures TRA-A, TRA-B and TRA-C must be reviewed and approved by the City. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, which prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies, including the City.

Comment GO17-165 5) Draft Environmental Impact Report – Chapter 3.17 – Transportation

a) Page 7 repeats that the City of Los Angeles Transportation Assessment Guidelines as noted in the Board memo would be followed. The current edition of the LADOT TAG was issued in August 2022. However, the required level of service analysis and comparisons were not included in either the Draft EIR or Appendix N, and this study has not been made available for public review and comment.

Response GO17-165 Refer to Response GO17-156 for discussion of the *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment*.

Comment GO17-166 b) The estimates of neighborhood riders and walkers on Page 26 do not appear to consider the topography vertical rise of 200 to 300 feet up to Dodger Stadium in the walkable and bikeable forecasts. The steep slopes of the streets and pathways discourage walking and biking. The estimates of neighborhood riders of the gondola are significantly overstated and must be reduced to account for the steep topography.

Response GO17-166 As noted on page 2-1 in Section 2.0, Project Description, of the Draft EIR, the proposed Project has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and

around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. It is precisely the topography and vertical rise that would be addressed by the proposed Project, providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS, including for those walking or biking. As shown in Table 3.17-4 on page 3.17-35, in Section 3.17, Transportation, of the Draft EIR, the neighborhood rider estimates range from 720 on weekends in 2026 to 1,625 on weekdays at 2042 and take into account US Census journey to work data, population and employment in the area, and the presence of other transit services. Additionally, as detailed on page 3.17-34, neighborhood riders are not factored into the VMT reduction estimates of the proposed Project for a more conservative analysis and have no bearing on the quantitative analysis or conclusions about the VMT and air quality and greenhouse gas benefits of the proposed Project in the Draft EIR.

Comment GO17-167 c) Page 27 states that the vehicle miles traveled (VMT) calculations are based on data collected in Year 2019, but there is no evidence or cross checking to support that these values are "current" or correct.

Response GO17-167 Due to the COVID-19 pandemic, the 2019 Major League Baseball season was the most recent season at the time of the Notice of Preparation for the Draft EIR and while the Draft EIR was under preparation that included a full season of games at Dodger Stadium. Therefore, as noted in Section 3.17, Transportation, of the Draft EIR, data regarding game attendance from the 2019 season was used in the estimation of VMT.

Comment GO17-168 d) Page 32 indicates the Proposed Project will result in only one change to intersection geometrics by shortening the northbound left turn lane from Alameda Street to Cesar Chavez Avenue by 150'. Shortening of this left turn lane from 320 feet to 170 feet will result in traffic waiting to turn left backing out of the shorter left turn lane, stopping in the through lane, and significantly increasing the potential for rear end collisions. This left turn lane is also signed as a primary route to reach Dodger Stadium. The capacity of this left turn lane will be cut in half, creating the need for other mitigation to accommodate the high northbound left turn demand.

Response GO17-168 As stated in Section 3.17, Transportation, of the Draft EIR, the main change to the existing street system would be to shorten the northbound left turn from Alameda Street onto Cesar E. Chavez Avenue by approximately 140 to 150 feet. All other proposed Project components would be located out of the roadway network and would not affect roadway capacity. Queue spillback beyond storage pockets is a common existing condition at major urban intersections during peak periods in the City of Los Angeles. Speed differential on roadways is the key driver in the potential for increased frequency and severe vehicular collisions that would occur associated with queue spillback. Downtown Los Angeles roadways, including Alameda Street, are generally congested and move below speed limits during peak periods, thereby

reducing the potential for collisions associated with queue spillback. Mobile device travel data provider Wejo was used to determine average weekday and weekend travel speeds from 2019. Weekday average travel speeds on northbound Alameda Street was 14.5 miles per hour in 2019, and weekend average travel speeds was 13 miles per hour.

Per the City of Los Angeles Transportation Assessment Guidelines (TAG), queue spillback is considered a Non-CEQA transportation metric, as it relates to vehicle operations, and it can be addressed by operational adjustments to signal timings. Queueing for northbound Alameda Street is largely affected by queueing on westbound Cesar E. Chavez Avenue, with capacity for the northbound left turn pocket metered by the capacity of the westbound receiving lanes on Cesar E. Chavez Avenue, which are limited due to the 125-foot storage capacity between the intersections of Main Street & Cesar E. Chavez Avenue, and Alameda Street & Cesar E. Chavez Avenue. Adjustments to the signal timing could be made for westbound Cesar E. Chavez Avenue at Main Street, and for the northbound left turn phase at Alameda Street & Cesar E. Chavez Avenue to serve vehicle demand with the reduced turn pocket length to minimize queue spillback.

Comment GO17-169 e) Page 40 incorrectly states that the 35 MPH posted speed limit on Alameda Street equates to 250 feet of stopping sight distance at the marked crosswalk at Alameda Station.

The 7th Edition of "A Policy on Geometric Design of Highways and Streets 2018 The Green Book" published by the American Association of State Highway and Transportation Officials (AASHTO) is the definitive resource of stopping sight distance. This publication is used by Caltrans as well as all local jurisdictions in California. Traffic engineers and transportation planners understand that stopping sight distance is based upon the design speed of the roadway under review, a speed which is typically 210 MPH higher than the posted speed limit. Stopping sight distance for a 45 MPH design speed is 360 feet, not 250 feet, as shown in Table 3-1 on Page 3-4, Stopping Sight Distance on level Roadways. Other measures to provide 360 feet of stopping sight distance are required.

All other discussions of stopping sight distance must be modified to reflect the use of the design speed which is typically 10 MPH higher than the posted speed limit and that requires additional stopping sight distance accordingly.

Response GO17-169 Both the *A Policy on Geometric Design of Highways and Streets* by AASHTO[52] and the *Highway Design Manual* by Caltrans[53] explain that design speed is dependent on the characteristics of the roadway and the context of the surrounding area. Table 101.2, Vehicular Design Speed, in Caltrans' *Highway Design Manual* provides that

[52] American Association of State Highway and Transportation Officials (AASHTO). 2018. A Policy on Geometric Design of Highways and Streets. Available at: https://store.transportation.org/Common/DownloadContentFiles?id=1776. Accessed August 2023.

[53] California Department of Transportation (Caltrans). 2020. Highway Design Manual, 7th Edition. Available at: https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm. Accessed August 2023.

design speeds for urban arterials that are main streets in regional/community centers shall be between 30 and 40 miles per hour (mph) and that design speeds for urban arterials in downtowns and city centers shall be 30 mph (note that Caltrans' use of the word "shall" makes the guidance in Table 101.2 mandatory). AASHTO states that urban arterial streets should be designed to permit running speeds of 20 to 45 mph, with speeds in the lower portion of this range applicable to local and collector streets and to arterial streets through more crowded business areas while speeds in the high portion of the range apply to high-type arterials in outlying suburban areas. The context of the streets in the Union Station and Chinatown areas in the vicinity of the Project's proposed Alameda Station is a urban downtown/regional center business area. Both suggest that use of 35 mph to determine stopping distance is appropriate as it is within the range mandated by Caltrans for urban regional/community centers, higher than the Caltrans guidance for urban arterials in downtowns and city centers, and on the higher side of the range suggested by AASHTO for urban arterial streets.

Comment GO17-170 f) Page 41 recommends prohibiting right turns on red at the Alameda Tower as a mitigation measure. "No Right Turn On Red" is not an effective mitigation measure as it does not guarantee safety for pedestrian crossings as vehicles may violate the posted right turn on red prohibition and they are then faced with a condition involving inadequate stopping sight distance.

Response GO17-170 As discussed on page 3.17-41, in Section 3.17, Transportation, of the Draft EIR, impacts would be less than significant with implementation of the visibility enhancements described under Mitigation Measure TRA-A, primarily by implementing a westbound no right turn on red restriction. This would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a westbound right turn on red. This Mitigation Measure is not a recommendation regarding potential vehicle and pedestrian conflict; rather, it is recommended to alleviate potential visibility issues for vehicles traveling northbound on Alameda Street. No right turn on red restrictions are commonly used at locations with potential visibility issues. Refer to Response GO17-159 for further discussion of Mitigation Measure TRA-A.

Comment GO17-171 g) Page 67 states that Mitigation Measures TRA-A will provide visibility enhancements at Alameda Tower and Chinatown Station but does not discuss what mitigation measures are recommended at these locations. The discussion should be expanded to describe the mitigation measure as has been done for Mitigation Measure TRA-B immediately following.

Response GO17-171 Refer to Response GO17-159 for discussion of Mitigation Measures TRA-A and TRA-B.

Comment GO17-172 h) Other mitigation measures are deferred and may not be timely as required. To be effective and complete, potential mitigation measures identified on the various

laundry lists must be studied and evaluated in the Draft EIR, with specific mitigation measures identified.

Response GO17-172 Refer to Responses GO17-159 and GO17-160 for discussion of how the use of plans in mitigation measures would not constitute impermissible deferral.

Comment GO17-173 6) Fehr & Peers Ridership Modeling (Appendix N of the Draft EIR)

Table 5 on Page 21 of Ridership Modeling in Appendix N of the Draft EIR estimates 6,000 game attendees would ride the gondola in 2026. Daily tourist riders on the gondola are estimated to be 1,270 per day on game days and 2,575 per day on non-game days. These forecasts are significantly higher than those presented in the other reports such as the Dodger Stadium Access Study discussed earlier in this letter and in the UCLA Mobility Lab Study discussed later in this letter.

Response GO17-173 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[54] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. As discussed in Response GO17-155, 1990 *Dodger Stadium Transit Access Study* prepared by Gruen Associates for the Los Angeles County Transportation Commission was prepared 33 years ago and evaluated a tramway, which is a different type of aerial technology than the proposed Project, which is a detachable 3S gondola with a capacity of 5,000 people per hour per direction. Comparisons between the two are not relevant. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for a detailed response to the UCLA Study.

Comment GO17-174 7) Fehr & Peers Draft Parking Study September 2022

a) Page 1 states "Detailed analysis of traffic associated with the proposed project are separately being evaluated in a non-CEQA transportation assessment in accordance with the City of Los Angeles Transportation Assessment Guidelines. This would involve calculation of level of service and delay at intersections (pre VMT), but these calculations and results are not found in the Draft EIR or in Appendix N.

[54] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Response GO17-174 Refer to Response GO17-156 for discussion of the *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment*.

Comment GO17-175 b) Pages 2 and 3 indicate that the Chinatown/State Park Station "could" include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge." Specific improvements need to be identified now (see Page 42 of Chapter 3.17) and included within the mitigation measures proposed in the Draft EIR.

Response GO17-175 Refer to Response GO17-162 regarding the pedestrian improvements between the Metro L (Gold) Line and the proposed Project's Chinatown/State Park Station. The pedestrian improvements are included as a feature of the proposed Project, and discussed as such in Section 2.0, Project Description; they are not required to mitigate any impacts related to construction and operation of the proposed Project.

Section 6.0, Design and Use Options, of the Draft EIR, includes Design and Use Option E, an analysis of State Parks' proposed Pedestrian Bridge at the Los Angeles State Historic Park. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, and while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge. Design and Use Option E is not required to mitigate any potential significant impacts related to construction or operation of the proposed Project.

Comment GO17-176 c) Page 10 states that a parking management plan will be developed before operation of the Proposed Project. Doing this at some future time rather than during the Draft EIR constitutes deferred mitigation by stating "Parking management strategies and specific implementation steps will be further detailed in a parking management plan prepared in the future in collaboration with the City of Los Angeles, who will be the implementor of any on-street parking management strategies… However, because the detailed parking management implementation plan will be reliant on completion of construction documents and the final operating plan, it will follow the completion of the environmental process for the proposed project."

Response GO17-176 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). However, parking is a key concern to the communities where proposed Project stations would be sited, as well as for decision makers. The Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and

Chinatown/State Park Station. The Parking Study determined that even with the addition of proposed Project vehicles parking in the area studied, publicly available parking on a game day would still be substantial, with an estimated 43 percent parking occupancy across the two half-mile station walksheds, and over 3,900 off-street parking spaces available to the community. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. In addition, a document providing a general outline of a typical parking management plan and potential strategies has been prepared. Because the Parking Study and, accordingly, the parking management plan are not required under CEQA or the TAG, no mitigation is required, as CEQA Guidelines section 15126.4 only requires mitigation for significant impacts. Accordingly, there is no "deferral" of mitigation. Nevertheless, refer to the proposed Project's Preliminary Parking Management Plan.[55]

Comment GO17-177 8) UCLA Mobility Lab – October 24, 2022 Study

A study using current modeling techniques recently completed by two UCLA researchers found that the gondola system could slightly reduce traffic on major roads around Dodger Stadium on the night of a sold-out baseball game, but that impact would likely be very limited. The study found that the gondola would likely take only around 608 cars off the road and that minor change would be unlikely to significantly reduce greenhouse gas emissions and traffic overall.

Response GO17-177 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. As discussed in the Topical Response, the authors of the UCLA Study at the Mobility Lab have issued a statement that the UCLA Study is considered preliminary. Moreover, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR.[56] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment GO17-178 Other fundings of the UCLA Mobility Lab Study are as follows:

a) Contrary to the Draft EIR, the gondola system would not significantly reduce traffic or greenhouse gas emissions around Dodger Stadium.

[55] Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.
[56] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Response GO17-178 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, and Response GO17-177 for discussion of Stantec's Peer Review.

Comment GO17-179 b) The gondola system would carry fewer passengers than the Draft EIR claims. About 4,690 passengers would take public transportation on game days. Of these, the model predicted 2,500 would use the Dodger Stadium Express buses, meaning that only 2,190 new passengers would take the gondola system. Doubling the number of buses would more than accommodate passengers that could be expected to ride the gondola.

Response GO17-179 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, and Response GO17-177 for discussion of Stantec's Peer Review.

Comment GO17-180 c) Fewer people would take the gondola after the game resulting in more traffic and emissions. The model disclosed about 2,500 passengers switching from the free Dodger Stadium Express buses to the gondola to the stadium, and about 1,000 fans switched back to the shuttle buses after the game. Only about 1,380 fans were forecast to use the gondola after the game as they would have to wait in long lines to use the gondola.

Response GO17-180 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, and Response GO17-177 for discussion of Stantec's Peer Review.

Comment GO17-181 d) Very few people were predicted to use the gondola for transportation other than getting to or from the games. Only 60 people, about one gondola carload, were forecast to travel to Dodger Stadium during the day, and only about 140 passengers would travel from Dodger Stadium to Chinatown or Union Station during the day.

Response GO17-181 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study, and Response GO17-177 for discussion of Stantec's Peer Review.

Comment GO17-182 Shuttle Busses and the Coachella Festival

As City Transportation Engineer for the City of Indio for 15 years, I was deeply involved in getting patrons to and from the Coachella Festival over two weekends in April each year. Shuttle buses from across California and adjoining states were contracted to travel various pre-planned routes throughout the Coachella Valley to and from the festival grounds each of the three days.

The successful transportation program developed by the festival promoter, Goldenvoice, split the attendees into three separate but approximately equal groups. These included those who arrived the day before and camped at the site until the day after the festival ended, those who commuted daily to and from the site using

Uber/Lyft/taxi, and those who rode Festival provided shuttle buses from hotels to and from the venue each day.

About one-third of the 250,000 daily festival attendees used the shuttle buses, with separated priority lanes on City streets for the shuttle buses near the festival site leading to a designated area within the festival site for shuttle bus loading and unloading. This system involved rapid turnover within the Festival shuttle bus lot with buses quickly filling empty bus parking stalls, loading/unloading passengers, and departing.

Response GO17-182 The Coachella Festival shuttle system is different from the Dodger Stadium Express in that the service is spread throughout the day over the multiple days of the festival, not focused on a few hours during urban peak congestion typical of a weekday evening game or event at Dodger Stadium. As a multi-day weekend music festival beginning at noon and ending at approximately midnight to 1:00 AM and with attendees that travel to the Palm Springs area for the festival, the Coachella Festival is fundamentally different than three-hour games at Dodger Stadium with fans coming from their daily places of residence or work. The Coachella Festival access system is designed with limited parking at the festival site and the shuttle system is designed to transport out-of-town attendees from various hotels throughout the Palm Springs area, most of whom do not have alternate transportation to the festival site. Given the amount of parking at Dodger Stadium, a substantial increase in Dodger Stadium event attendees using transit to travel to the Stadium would depend on reduced travel times, which an expanded Dodger Stadium Express service would not provide.

Comment GO17-183 Summary and Conclusion

When it was evaluated over 30 years ago, the gondola finished last in comparison with five other transportation alternatives to serve Dodger Stadium. Such a comparison today ends up with similar results.

Response GO17-183 As discussed in Response GO17-155, the Dodger Stadium Access Study was prepared 33 years ago and evaluated a tramway, which is a different type of aerial technology than the proposed Project, which is a detachable 3S gondola with a capacity of 5,000 people per hour per direction. Comparisons between the two are not relevant. Refer to Section 4.0, Alternatives, of the Draft EIR and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for an evaluation of alternatives to the proposed Project.

Comment GO17-184 The proposed Gondola is better suited for sightseeing rather than being an effective transportation measure to move large volumes of people in short periods of time. Shuttle buses together with Uber/Lyft/taxi services now serve Dodger Stadium well at a fraction of the cost. An expansion of the shuttle bus operation between Dodger Stadium Express in lieu of the proposed gondola system would efficiently meet the

demand to transport people in a cost-effective manner on game days and on special event days.

Response GO17-184 Regarding the comment that the proposed gondola is not an effective way to move large volumes of people in short periods of time, similar modern 3S systems are in use for urban transit systems in a number of cities around the world including Koblenz, Germany, Phu Quoc, Vietnam, and Toulouse, France (see Table 2-1 on page 2-4 in Section 2.0, Project Description of the Draft EIR). Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of potential capacity of an expansion of the Dodger Stadium Express shuttle bus system. The commenter does not provide any independent technical analysis to support the allegation in the comment that such an expansion in lieu of the proposed Project would efficiently meet the demand in a cost-effective manner.

Regarding the comment that shuttle buses together with Uber/Lyft/taxi services now serve Dodger Stadium well, as indicated on page 3.17-27, in Section 3.17, Transportation, of the Draft EIR, only 4.7 percent of Dodger Stadium game attendees rode the Dodger Stadium Express in 2019. Furthermore, Dodger Stadium generates traffic congestion and annual VMT and associated emissions.[57]

Comment GO17-185 The omissions and errors summarized and detailed throughout this letter require that each of these issues and items be reanalyzed and reevaluated through additional study before the Proposed Project is considered further by Metro.

If you have questions regarding these comments, please contact me at your convenience.

[57] As shown in Table 3.17-3 on page 3.17-30, in Section 3.17, Transportation of the Draft EIR, Dodger Stadium is estimated to have generated 53,549,000 VMT in 2019. As shown in Table 3.8-1 on page 3.8-17, in Section 3.08, Greenhouse Gas Emissions in the Draft EIR, Dodger Stadium is estimated to have generated 19,655 metric tons of on-road mobile emissions in 2019. As shown in Table 3.3-5 on page 3.3-23, in Section 3.03, Air Quality of the Draft EIR, Dodger Stadium is estimated to have generated an average of 565 daily pounds of CO, 1.15 daily pounds of SO_X, 40.3 daily pounds of NO_X, 34.8 pounds of VOC, 103.4 pounds of PM_{10}, and 26.2 pounds of $PM_{2.5}$ in 2019.

Response GO17-185 Responses GO17-154 through Response GO17-184 respond to each of the comments raised in Enclosure 5 to Letter GO17. The analyses and conclusions in the Draft EIR regarding the transportation impacts of the proposed Project are appropriate and supportable. Reanalysis and reevaluation is not warranted.

Comment GO17-186 Enclosure 6

Dear Mr. Carstens:

Environmental Audit, Inc. (EAI) has reviewed portions of the October 2022 Draft Environmental Impact Report (Draft EIR) for the Los Angeles Aerial Rapid Transit (LA ART) Project in the City of Los Angeles prepared by AECOM for the Los Angeles County Metropolitan Transportation Authority (Metro).

Sections of the Draft EIR that we have reviewed include:

- Executive Summary
- Chapter 2 – Project Description
- Chapter 3.3 – Air Quality
- Chapter 3.6 – Energy
- Chapter 3.8 – Greenhouse Gas Emissions
- Chapter 3.11 – Land use and Planning
- Chapter 3.17 – Transportation
- Appendix A – Scoping Report
- Appendix B – Construction Assumptions
- Appendix D – Air Quality and Health Risk Assessment Technical Report
- Appendix H – Energy Technical Report
- Appendix J – GHG Technical Report
- Appendix N – Transportation

The following are our comments.

Response GO17-186 This comment provides a general introduction to the comments raised in Comments GO17-187 through GO17-201 (Enclosure 6). Responses to these comments are provided below in Responses GO17-187 through GO17-201.

Comment GO17-187 1. GENERAL COMMENT

The Draft EIR indicates that the tramway will move 5,000 people per hour, with 30-40 people per gondola. If that is correct, a total of approximately 43 gondolas per hour would be needed (35 people x 143 gondolas = 5,005 people). To transport that many gondolas, a gondola would need to arrive, load and leave every 20 to 30 seconds. Each time a gondola arrived at Dodger Stadium, it would also have to empty every 20 to 30 second. This timing does not allow for the additional time required for children, the elderly or handicap people and would be difficult, if not impossible to achieve. These assumptions are overly aggressive and lead to an overestimate of the number

of people that would use the LA ART as an alternative to driving vehicles or using other forms of transportation.

Response GO17-187 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Based on the current design, the calculated characteristics when operating at system capacity (e.g., during Dodger games or events at Dodger Stadium) would be approximately 53 cabins in service on the system. Under this scenario, the cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds). The proposed Project's 3S cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd. To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd. Furthermore, the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

Comment GO17-188 2. AIR QUALITY

- The air quality and GHG emission benefits of the project have been overstated. The mobile emissions take credit for non-Project (Regulatory) related emissions reductions for future years. This misrepresents the actual impacts of the proposed Project. The actual analysis should only receive reductions for changes created by the proposed. For example, the proposed Project claims reduction in vehicle miles travelled, therefore, emission reductions were directly attributed to the proposed Project. This would be a correct application for reductions from the proposed Project. However, the proposed Project also compares 2019 mobile emission factors to 2026/2042 emissions factors. The latter emission factors get the benefit of regulatory/technology changes not related to the proposed Project. This mistakenly credits the proposed Project with emissions reductions that are not created by the proposed Project. Instead, the analysis should have used the same basis (emissions factors) to show the real impacts from the

proposed Project, without influence from external sources (e.g., unrelated regulations).

Response GO17-188 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. CEQA Guidelines section 15125 provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. As the CEQA Guidelines make clear, an EIR normally compares a project's impacts against the "baseline" conditions as they exist at the time the CEQA document is prepared. For air quality and GHG emissions, this translates to evaluating the difference between the existing pre-project emissions and the estimated post-project emissions (as estimated by running air quality modeling). This approach of comparing the project's estimated emissions against the existing "baseline" emissions is consistent with guidance from the South Coast AQMD and represents standard practice for EIRs prepared within the South Coast Air Basin and the state.[58] The Draft EIR appropriately followed this recognized methodology by establishing the baseline as the actual environmental conditions existing at the time of the CEQA analysis. For this proposed Project, the baseline was set to evaluate the conditions that existed in 2019 based on the available air quality data. The proposed Project buildout year is 2026. To accurately estimate the proposed Project's emissions when it commences operations in 2026, the Draft EIR utilized the SCAQMD-recommend model (CalEEMod®), which takes into account vehicle emission factors (EMFAC2021) recommended by the expert agencies. Specifically, EMFAC2021, used to estimate vehicular emissions, is USEPA-approved and developed by the California Air Resources Board to capture statewide efforts to reduce mobile source emissions and accurately project those future emissions. The CalEEMod® model was developed by SCAQMD in coordination with other California air districts and is recommended for use by SCAQMD. These models incorporate existing regulations that require vehicle emissions to decline over time as more stringent air quality mandates are imposed, thereby EIRs accurately estimate emissions at the buildout year. The Draft EIR followed this agency-recommended approach by applying the latest versions of CalEEMod® and EMFAC2021 to estimate the air quality and greenhouse gas emissions impact, as was described in the Draft EIR's methodology sections. See Section 3.03, Air Quality, and Section 3.08,

[58] See, e.g., South Coast Air Quality Management District (SCAQMD). 2021. Quemetco Capacity Upgrade Project. Available at: https://files.ceqanet.opr.ca.gov/8174-2/attachment/7bvblgECW7xJV9wgG2iJtxOnqiCHDXVYZLElXRtEw6yx_ZV_m7nE0LafkaH0CyHRtX_pxrlrz99FgzFP0. Accessed August 2023 (analyzed existing conditions as the baseline compared against future estimated project emissions).

Greenhouse Gas Emissions, of the Draft EIR for an analysis of the proposed Project's air quality and greenhouse gas emissions impacts, respectively.

In addition to aligning with agency-recommended guidance for preparing EIRs, the Draft EIR's baseline methodology is consistent with other net-zero GHG emissions projects that have been approved by the California Air Resources Board—the state expert agency on climate and air quality matters—and the Governor's office under the 2011 Jobs and Economic Improvement Through Environmental Leadership Act (commonly referred to as "AB 900"). Specifically, the California Air Resources Board determined that AB 900 projects achieved net-zero GHG emissions by comparing the estimated future project emissions against the existing conditions at the time the CEQA analysis was prepared—the analogous baseline methodology applied by the Draft EIR.[59]

Therefore, the comment's assertion is not correct that "air quality and GHG emission benefits of the project have been overstated." Rather, the Draft EIR appropriately evaluated the proposed Project's air quality and greenhouse gas emissions consistent with agency guidance and precedent by comparing the pre-Project baseline to the modeled post-Project condition, and identified the emission reductions (i.e. "benefits") based on those calculations. The Draft EIR and supporting appendices included all the relevant calculations and modeling files supporting the analysis and conclusions. Lastly, the comment also incorrectly suggests that "unrelated regulations" are incorporated to the benefit of the proposed Project. The comment itself is not supported by citation or evidence and is not consistent with agency-recommended guidance because any "unrelated regulations" would not impact the proposed Project emissions and therefore should not be taken into account.

Comment GO17-189

- The haul trips to move soil during construction activities were based on 20 miles per trip. If any hazardous soil is encountered during the excavation, the mileage could be grossly inadequate since contaminated soil needs to be hauled to a hazardous waste facility, the closest of which is Clean Harbors in Buttonwillow, California approximately 140 miles from Union Station. Further, it is likely that the project construction team would know the distances to the landfills that will be used for clean soil. The likely landfills for clean soil in the area are the Azusa (21.7 miles from Union Station), Chiquita Canyon (40 miles from Union Station), and Simi Valley Landfills (42 miles from Union Station). The air quality impacts associated with these construction activities must be revised and updated with accurate assumptions.

[59] See, e.g., Eyestone Environmental. 2016. Crossroads Hollywood Project. Available at: https://planning.lacity.org/eir/CrossroadsHwd/Deir/Deir_EX/AgencyCorrespondence/Files/2016.11.18%200201pm%20-%20FW_%20ARB%20Determination%20AB%20900.pdf. Accessed August 2023 (applied existing conditions as the baseline compared against future estimated project emissions). Ramboll. 2018. Portrero Power Plant Mixed-Use development GHG Emissions Methodology and Documentation. Available at: http://docs.ppsmixeduse.com/ppp/AB_900/2018_0831_carb_ab900-determination.pdf. Accessed August 2023 (applied existing conditions as the baseline compared against future estimated project emissions).

Response GO17-189 Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for discussion of how the emissions from haul truck trips would not result in a significant impact.

The Draft EIR analyzed air quality impacts, including those related to emissions from haul truck trips during construction, in accordance with applicable SCAQMD guidance and using California Emissions Estimator Model® (CalEEMod®), the most current air quality model endorsed by the SCAQMD and the California Air Pollution Control Officers Association.[60] The CalEEMod® model was developed by SCAQMD in coordination with other California air districts and is recommended for use by SCAQMD.[61] Based on this analysis, the Draft EIR concludes that the proposed Project will not cause an exceedance to any SCAQMD significance threshold, including construction emissions.

Specifically, the Draft EIR addressed the assumptions for trip lengths, as being derived from regional data and incorporated in CalEEMod®, in Section 3.03.3 of the Draft EIR, with additional technical details in Section 4.3.2.2 of Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR. The analysis presented in the Draft EIR and Appendix D estimating air quality impacts of construction was based on a combination of Project-specific data and CalEEMod® model default data. CalEEMod® technical documentation notes that the default hauling trip length is 20 miles, which is meant to serve as a reasonable approximation for hauling material to and from a project site in the absence of project-specific data.[62]

The comment raises concerns regarding the potential for contaminated soil and the assumed haul trip distance for exported soil. As noted above, the Draft EIR addressed haul trip length assumptions in Section 4.3.2.2 of Appendix D, of the Draft EIR. The final use and/or disposal location of excavated soil is not known at this time; thus the haul trip length used in the analysis was the model default, which represents a reasonable estimate for exported soil (which, as referenced in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, does not necessarily need to be disposed of as waste at a landfill) because some disposal sites may be located closer than the regional 20-mile default assumption and some disposal sites may be located farther away.

An EIR need not identify the exact location of the haul route because those details are frequently determined during construction based on actual excavated soil conditions, which cannot be known at the time of the EIR preparation.

Nevertheless, in response to this comment, additional analysis was prepared of construction emissions based on a potential need to dispose of certain excavated

[60] California Air Pollution Control Officers Association (CAPCOA). 2021. CalEEMod® User Guide Version 2020.4.0. Available at: http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/01_user-39-s-guide2020-4-0.pdf?sfvrsn=6. Accessed: August 2023.

[61] South Coast Air Quality Management District (SCAQMD). 2023. Air Quality Modeling. Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling. Accessed: August 2023.

[62] California Air Pollution Control Officers Association (CAPCOA). 2021. CalEEMod® Appendix A: Calculation Details for CalEEMod®. Available at: http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6. Accessed: August 2023.

material as waste at certain identified landfills that may be located farther than the 20-mile default CalEEMod® assumption.

Specifically, Ramboll evaluated how the estimated hauling vehicle emissions provided in Table C.1-1 through Table C.2-4 in Appendix D, would be affected in the event excavated material required disposal at a landfill as either non-hazardous or hazardous waste.[63]

Using historical soil information from prior site evaluations at the proposed Project component locations, Appendix M, Potential Excavated Material Disposal Analysis, of the Final EIR, was prepared, which conservatively estimated that approximately 14,119 cubic yards (cy) of material could potentially require disposal at a landfill as waste. Based on the potential contaminants and their concentrations in the excavated material, such material may be classified as 1) non-hazardous, 2) non-RCRA hazardous, or 3) RCRA hazardous. As summarized in Appendix M, Potential Excavated Material Disposal Analysis, of the Final EIR, it was estimated that 11,802 cy of the 14,119 cy may require disposal at a landfill as non-hazardous waste.

Three landfills, Azusa Landfill (approximately 21.5 miles from the furthest proposed Project component site), Chiquita Canyon Landfill (approximately 39.1 miles from the furthest proposed Project component site), and Waste Management Simi Valley Landfill (approximately 42.3 miles from the furthest proposed Project component site) as potential disposal locations for impacted, non-hazardous material, all of which landfills have adequate capacity to accept the potential export materials. As a conservative assumption, it was assumed that all exported material in this category would be transported to the furthest Waste Management Simi Valley Landfill, even though it is anticipated that some export material in this category could be exported to the more proximate landfills during construction.

It was conservatively estimated that 3,037 cy of the 14,119 cy may require disposal as non-RCRA and/or RCRA hazardous waste. Two landfills, Waste Management Kettleman Hills Landfill (approximately 177 miles from the furthest proposed Project component site) and Clean Harbors Buttonwillow Landfill (approximately 139 miles from the further proposed Project component site), were identified as potential disposal locations for non-RCRA and RCRA hazardous waste, both of which landfills have adequate capacity to accept the potential export materials. All landfill trip distances from the furthest proposed Project component site were obtained from Google Maps. As a conservative assumption, it was assumed that all exported material in this category would be transported to the further Waste Management Kettleman Hills Landfill, even though it is anticipated that some export material in this category could be exported to the more proximate Clean Harbors Buttonwillow Landfill during construction.

[63] Note that excavated material that does not require disposal at a landfill as non-hazardous hazardous or hazardous waste could be sent to Hanson Aggregates in Irwindale and Scholl Canyon in Glendale, both of which are less than 20 miles away from the proposed Project.

The maximum daily construction emissions difference based on these conservative hauling distances is as follows:

	Maximum Daily Construction Emissions (lb/day)					
	ROG	**CO**	**NOx**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Draft EIR Analysis Using Model Default Model Distances	24	258	51	0.5	11.8	3.8
Additional Analysis Based on Site Conservative Hauling Assumptions	24	258	79	0.7	18.7	5.9
SCAQMD Significance Thresholds	**75**	**550**	**100**	**150**	**150**	**55**
Exceedance of the Threshold for Any Year of Construction?	NO	NO	NO	NO	NO	NO

Accounting for the analysis more conservative hauling distances for exported material does not change the significance conclusions related to the proposed Project's construction emissions, meaning that the proposed Project's construction emissions would not exceed the applicable significance thresholds even assuming the longer hauling distances suggested by the comment and maximum daily construction emissions would remain less than significant.

Comment GO17-190

- Emissions for the gondola operations are shown as a negative number (Table 4-8 of Appendix J), which is disingenuous. It would be understandable to calculate the potential emissions from the electricity use then apply GHG credits for a mitigation measure, but showing the value as a negative number implies the proposed Project is generating the GHG credits, which is false.
- Emissions for the backup battery system are shown as a negative number (Table 4-10 of Appendix J). The same logic applies. The proposed Project is not generating GHG credits for using backup batteries. Using battery power instead of diesel should be a mitigation measure.

Response GO17-190 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, for a discussion of the proposed Project's potential greenhouse gas emissions from operations. The Draft EIR concludes that the Project would not cause a significant GHG impact and, as an innovative alternative mode of transportation, will reduce GHG emissions over time by reducing VMT. The comment misstates Table 4-8, which is not intended to show "GHG credits" for a mitigation measure. Rather, Table 4-8 shows the GHG emissions from the gondola if power from LADWP's Green Power Program were not used. As discussed in Footnote 5 of Table 4-8, the negative number referenced in the comment does not represent a "GHG credit" but instead shows the emissions benefit gained by the proposed Project by committing to LADWP's Green Power Program pursuant to GHG-PDF-A, which is supplied by 100% renewable resources. The depicted number is "negative" to show the potential emissions that are avoided through the use of renewable resources. If

the proposed Project did not commit to sourcing electricity through this renewable program, the emissions would be positive and would be included within the proposed Project emissions inventory. Thus, the table shows the benefits of utilizing power from 100% renewable resources by comparing emissions from more conventional power supplies. The table does not, as the comment suggest, show a "GHG credit" and the Draft EIR does not rely on GHG credits to reach its determination that the proposed Project results in a less than significant GHG impact.

Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, for a discussion of the proposed Project's potential greenhouse gas emissions from operations. The Draft EIR concludes that the proposed Project would not cause a significant GHG impact and, as an innovative alternative mode of transportation, will reduce GHG emissions over time by reducing VMT. The comment misstates Table 4-10, which is not intended to show "GHG credits" for a mitigation measure. As discussed in Footnote 3 of Table 4-10, emissions are shown as negative to represent the emissions benefit gained by the proposed Project by committing to batteries as the backup power supply. The number is negative because the number represents the emissions that are avoided by avoiding use of conventional diesel backup generators. Thus, the table shows the benefits of using batteries by comparing to emissions from more conventional power supply systems. The table does not, as the comment suggests, show a "GHG credit" and the Draft EIR does not rely on GHG credits to reach its determination that the Project results in a less than significant GHG impact. Accordingly, the incorporation of battery power rather than diesel as a mitigation measure is not required because there is no significant impact requiring mitigation pursuant to CEQA Section 21002.1(a).

Refer to Section 2.0, Project Description, for a discussion of how backup power would be provided by battery storage located at each station and tower and the non-passenger junction.

Comment GO17-191

- The DEIR relies on the 2016 AQMP, which is outdated. The 2022 AQMP has been drafted and is scheduled to be approved by the SCAQMD Governing Board on December 2, 2022. Appendix D).

Response GO17-191 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for a discussion of the proposed Project's consistency with the 2016 Air Quality Management Plan (AQMP) as that was the adopted AQMP and the AQMP incorporated into the State Implementation Plan (SIP) at the time the Draft EIR was prepared. Furthermore, the Draft EIR addressed the 2022 AQMP in Section 2.3.5.1 of Appendix D and acknowledged the draft status of the plan at the time of the Draft EIR preparation. While the SCAQMD Governing

Board approved the 2022 AQMP, it has not yet been approved by USEPA and thus not yet been incorporated into the SIP. The analysis completed by the Draft EIR is still appropriate in terms of assessing consistency with the 2016 AQMP.

It is noted that the proposed measures of the 2022 AQMP build off similar programs in the 2016 AQMP to reduce mobile source emissions through further adoption of advanced technologies for on-road emissions sources and zero-emission infrastructure for mobile sources. A key goal identified in the 2022 AQMP, as with the 2016 AQMP, is to reduce vehicle-related emissions in the air basin, including through the reduction of VMT. The proposed Project is consistent with the adopted 2022 AQMP for many of the same reasons the proposed Project is consistent with the 2016 AQMP. The proposed Project is an innovative alternative transportation that reduces air pollutants and GHGs by reducing VMT (see Draft EIR, Section 3.8.4), thereby advancing key objectives of the 2016 AQMP and proposed 2022 AQMP. Vehicle emissions are a major source of ozone-forming emissions and reducing ozone is a critical component of the 2022 AMQP; therefore, the proposed Project aligns with and supports the adopted 2022 AQMP's goals, as with the 2016 AQMP.

It is also noted that the 2022 AQMP estimates future emissions inventories and targets assuming growth in population and economic output of the region, as supported by SCAG projections. The purpose of referencing such growth in the 2022 AQMP is to underscore potential challenges to achieving necessary emissions reductions while upholding general growth of the region. The proposed Project would offer a mode of transportation that would support the population and economic growth of the region by enabling regional ridership capacity through an innovative technology with the benefit of reducing emissions.

Comment GO17-192 3. ENERGY

- Appendix H Energy Technical Report (page 22). The Draft EIR indicates that electricity will be supplied using the LADWP's Green Power Program, indicating that the primary electricity for the project would come from renewable energy sources. As this is one of the primary ways the project is minimizing increases in GHG emissions, an enforceable mitigation measure must be provided to ensure this project assumption is enforced.

Response GO17-192 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. for a discussion of greenhouse gas emissions from operation of the proposed Project. The Draft EIR concludes that the proposed Project will not cause a significant GHG impact and, as an innovative alternative mode of transportation, will reduce GHG emissions over time by reducing VMT.

Because the Draft EIR concludes that the proposed Project's GHG emissions are less than significant, no mitigation measures are needed to reduce the proposed Project's GHG emissions. The proposed Project's use of electricity supplied from LADWP's

Green Power Program is a voluntary commitment by the proposed Project to further demonstrate the proposed Project's leadership towards sustainable transportation and reducing GHG emissions. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program.

Comment GO17-193

- Section 3.0 of the Draft EIR indicates that the environmental setting is the physical conditions in the vicinity of the proposed project at the time of publication of the Notice of Preparation (NOP), which is October 1, 2020. However, data used to calculate baseline conditions varies. For example, 2019 was considered to be the baseline conditions for the energy analysis (see page 3.6-13). The Draft EIR must explain the appropriate environmental setting and why the impact analysis for different resources used different years. Further data regarding the existing fuel consumption was based on 2016 data, which is at least 8 years old (see page 3.6-13) and not consistent with the release of the NOP.

Response GO17-193 Data used to evaluate baseline conditions were based on the availability of complete data at the time of preparation of the Draft EIR. As described in Section 3.6.2, Environmental Setting, of the Draft EIR, the electricity usage was based on the most currently available data (from 2020) as of the preparation of the Draft EIR. Similarly, the cited fuel usage was based on the most currently available data (from 2016) as of the preparation of the Draft EIR. The comment raises concern regarding the fuel consumption data from 2016 but does not provide any explanation for the concern. The fuel consumption data was the most recent data available at the time the Draft EIR was prepared. Fuel consumption has generally remained relatively steady in California in recent years based on annual natural gas and gasoline consumption data published by the United States Energy Information Administration (EIA); therefore, even if more current data were available at the time the EIR was prepared, it would not likely have a material change in the data presented and would not have changed the significance conclusions because the Project reduces fuel usage over time by reducing VMT.

Comment GO17-194

- Page 3.6-15: The DEIR indicates that construction would result in a demand of approximately 864,544 kWh of electricity. Please provide the assumptions used to calculate the electricity use during construction.

Response GO17-194 Refer to Section 3.6.4.2, Electricity, of Section 3.06, Energy, of the Draft EIR, for the value used for electricity consumption during construction, with further technical details provided in Table 4-6 of Appendix J, Greenhouse Gas Emissions Technical Report. This value reflects the sum of estimated electricity consumption for construction of each gondola station, tower, and non-passenger junction. Electricity demand was estimated by the proposed Project's construction consultant for anticipated sources of electricity consumption including trailers, welders, site lighting, and charging for battery-powered equipment. The construction consultant determined the electricity consumption for each source based on the daily electricity consumption and days of operation for the total quantity of sources. The estimated electricity consumption for sources pertaining to each gondola station, tower, and non-passenger junction were summed to obtain the total electricity consumption value during construction.

Comment GO17-195

- DEIR page 3.6-15 and Appendix H: The DEIR states that the Project's construction electricity use represents a small percentage of regional estimates for the LADWP. It further states that: "The CEC estimates that energy demand in the LADWP planning area will increase to approximately 27,000 to 28,000 GWh in the 2024 to 2026 timeframe, meaning the proposed "project's demand contribution in that period would be approximately 0.002 percent of the projected demand." (see DEIR page 3.6-15). According to the footnote, the peak demand or LADWP is based on a CEC reference from 2016 and used data from 2015. With the move toward renewables and the problems that the electricity grid had maintaining electricity during peak demand periods in 2022, more recent data should be used. Further, for the same reason, the DEIR should explain whether the LADWP has excess RENEWBABLE electricity available for the proposed project. Per the DEIR assumptions, it is assumed that all electricity use associated with the operation on the project will be renewable. A mitigation measure should be developed to enforce this assumption.

Response GO17-195 Refer to Response GO17-196 for a discussion of the proposed Project's electricity consumption. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Projects energy demand. The purpose of the discussion on Draft EIR page 3.6-15 and in Appendix H, Energy Technical Report, was to support the significance determinations made in relation to the Project's energy consumption. Energy significance is defined by two thresholds under CEQA Guidelines Appendix G, which is in turn summarized in Section 3.6.4 of the Draft EIR, providing:

Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Comparison of the CEC estimates to the proposed Project's anticipated construction electricity demand was made based on the most currently available data at the time of the Draft EIR preparation. Additionally, future demand projections made by the National Renewable Energy Laboratory (NREL) in March 2021 for LADWP align with the referenced projections made by the CEC. The demand dedicated to proposed Project construction represents a very small fraction of the total estimated electricity demand from LADWP, and the energy significance determinations made for the proposed Project remain consistent when relying upon data from either source.

The availability of electricity is addressed in Section 3.19, Utilities and Service Systems, of the Draft EIR, which confirmed that there would be sufficient electricity available for the proposed Project. , Further, as discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. The Draft EIR concluded that the proposed Project's GHG emissions are less than significant, and thus there are no required mitigation measures. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Comment GO17-196 Further, the DEIR indicates that the peak demand in the LADWP planning area is expected to reach 6,400 to 6,500 MW in the 2024 to 2026 timeframe. Please note that the LADWP reports that the record peak demand was 6,502 MW on August 31, 2017.[1] Therefore, this peak demand has already been reached and the data provided in the DEIR is not valid, likely because the information used for the baseline is outdated. The potential energy impacts are significant as LADWP does not currently have the excess electrical supply capacity to provide electricity to the proposed project.

Footnote 1: LADWP Facts and Figures. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factsandfigures?_adf.ctrl-state=10n9mool8q_4&_afrLoop=494270252036354

Response GO17-196 Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR for a discussion of how the proposed Project's potential energy impacts would be less than significant. The comment suggests that the analysis needs to be redone based on data it has listed regarding peak demand. The data used in the analysis were based on availability of complete data at the time of preparation of the Draft EIR. As previously stated, Appendix H was prepared to evaluate energy significance under CEQA via the CEQA thresholds regarding wasteful, inefficient, or unnecessary consumption of energy resources and regarding conflicting with or obstructing a state or local plan for renewable energy or energy efficiency. The data presented by the comment on peak demand does not change the analysis nor the conclusions of the Energy analysis. Section 5.1.3.1 of Appendix H of the Draft EIR, cited the increase in peak demand from 6,400 to 6,500 MW in the 2024 to 2026 timeframe to demonstrate how the proposed Project would have a negligible effect on LADWP peak demands. The estimated peak electricity demand from Project construction is 2.0 MW, and the peak demand value noted by the commenter further supports the proposed Project's minimal contribution to LADWP peak demand during construction because the Project's construction demands are temporary in nature and are well within LADWP's planned power supplies. LADWP recently published a Draft Power Strategic Long-Term Resource Plan (SLTRP) which serves as a comprehensive roadmap through 2045 that guides the LADWP Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. In this SLTRP, LADWP states plans to add approximately 3,000 MW of new renewable projects in order to accelerate its renewable energy target to 80% renewables and 97% zero-carbon resources by 2030. The electricity consumption within LADWP's service territory is forecasted to decrease 0.3% over the next five years as energy efficiency and customer-installed solar photovoltaic (PV) expansion offsets growth from economic activity. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. Refer to Section 3.06 for a discussion of the 2017 SLTRP, and Section 2.2.4.2 of Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the 2017 SLTRP as an expansion of the existing Power Integrated Resource Plan.

Comment GO17-197 Further evidence of the use of an inappropriate baseline is the Proclamation of a State of Emergency signed by Governor Gavin Newsom on August 31, 2022. The Proclamation declared that immediate action was required to reduce the strain on the energy infrastructure and increase energy capacity during the Extreme Heat Event late August through early September, 2022). The California Independent System Operator (CASIO) forecasted high electric demand due to the extreme heat event with peak load projected to exceed 48,000 MW and which would exceed the available electricity.[2] Further, this event was classified as an "emergency event" which allowed

existing portable generators including diesel generators) to operate under emergency conditions, regardless of any permit conditions.

Footnote 2: https://www.gov.ca.gov/wp-content/uploads/2022/08/8.31.22-Heat-Proclamation.pdf?emrc=78e3fc

Response GO17-197 This comment provides a general recitation and characterization of Governor Newsom's Proclamation of a State of Emergency signed August 31, 2022, but does not raise a substantive issue on the content of the Draft EIR. The discussion in this comment on forecasted electricity demand does not provide relevant information that would impact the selection of the baseline conditions used in the proposed Project's energy significance determination. Section 3.6.1.4 of Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, discuss the current LADWP Strategic Long-Term Resource Plan (SLTRP) in place at the time of preparation of the analyses. Since that time, the Draft 2022 SLTRP has been released and provides additional forecasting out to 2045. The LADWP's 2021 load forecast is used to project customer demand for electricity over the next 20 years, and the modeling in the SLTRP set the capacity requirements to ensure that LADWP has sufficient capacity to meet customer load, even during extreme events. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program

Comment GO17-198

- Page 3.6-16. The DEIR indicates that the proposed project would result in electricity demand of approximately 6.9 GWh/year and dismisses the impact because the electricity increase would be 0.002 percent of the projected statewide demand in 2026. However, currently the electricity demand is not sufficient to meet current demands during peak electricity use periods (e.g., hot summer months). The DEIR should compare the proposed project's electricity use with the current electricity generation by LADWP, since LADWP will supply electricity to the project beginning in 2026 first. There is currently not sufficient electricity system should not only be compared to the projected electricity production in 2042 (which may or may not actually occur).

Response GO17-198 Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Project's potential energy-related impacts, concluding that the proposed Project would result in a less than significant impact. The comment suggests that electricity production is not sufficient to meet current demands; however, it has not provided any new citations or data not previously addressed. Therefore, no new response is required. Furthermore, Section 3.06, Energy, of the Draft EIR, evaluated the proposed Project's energy-related impacts against the relevant significance thresholds from Appendix G of the CEQA Guidelines

and found those impacts to be less than significant. Importantly, it was found that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Refer to Section 3.6.4.2 of the Draft EIR, for an evaluation of how the proposed Project's potential impacts considered the effects of the proposed Project on peak and base period demands for electricity, which included evaluations of the proposed Project's electricity demand against projections of LADWP's future electricity demand. In this analysis, the Draft EIR does not speculate on LADWP's future supply. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program.

Comment GO17-199

- Assumption regarding the use of transit service. The DEIR assumes that ridership for transit will increase (need page no.). Since 1990, the SCAG region added over 100 miles of light and heavy rail in Los Angeles County and over 530 miles of commuter rail region-wide. These investments have not been matched by increases in transit ridership. Transit ridership in the southern California area reached its peak in 1985 and has been mostly declining since 2007, and has fallen consistently since 2013.[3]

- Further, about two percent of the population rides transit very frequently (averaging 45 trips/month), another 20 percent of the population rides transit occasionally (averaging 12 trips/month), and more than three-quarters of SCAG-region residents ride transit very little or not at all less than 1 trip/month).

Footnote 3: UCLA Institute of Transportation Studies, prepared for the Southern California Association of Governments, January 2018. Available at: https://scag.ca.gov/sites/main/files/file-attachments/its_scag_transit_ridership.pdf.

Response GO17-199 This comment provides a general recitation and characterization of the changes in the transit network and references studies on regional transit ridership. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model, which is based on extensive data sources and assumptions validated by data. Given the uniqueness of a gondola as a mode of transportation, a model specifically tailored to games and events at Dodger Stadium was developed to estimate ridership of the proposed Project, and the results of this model were used to project ridership and associated potential operational effects including queuing. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos travelling to sporting events in

Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit, parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data. As described in Appendix N, the proposed Project transit access model analyzes the proposed Project ridership that is expected to come from the transit system, primarily Metro and Metrolink services connecting to the proposed Project at the Alameda Station or the Chinatown/State Park Station. The park and ride model analyzes proposed Project ridership that would come from riders parking within a ½ mile walking distance of either station, or from vehicle drop-offs at either station from a TNC service such as Uber or Lyft. The existing model was then calibrated to existing conditions for the share of Dodger Stadium Express riders that take transit to LAUS based on data prepared by Metro in reports to the South Coast Air Quality Management District (SCAQMD) for the 2011-2015 Dodger seasons. Metro also provided Fehr & Peers with intercept survey data collected in the 2014 season. Attachment A to Appendix N includes the 2014 data provided by Metro and summarizes the range in mode of access for Dodger Stadium Express across the years that Metro analyzed. Mode of Access to Dodger Stadium ranged from 91% non-auto to 74% non-auto. Fehr & Peers applied the mode of access percentages from the 2014 data, because they offered substantially higher number of samples compared with the data cited in Metro's reports to SCAQMD. Metro's data indicated an evening game non-auto mode of access of 74%, and a daytime game non-auto mode of access of 91.4%. In the vehicle miles travelled (VMT) benefit calculation in the transportation section of the EIR, Fehr & Peers applied the evening mode of access to all evening games, and the daytime mode of access to day games. While transit mode of access is expected to improve with the expansion of the Measure R & M network and improved transit travel time competitiveness, for a more conservative estimate, Fehr & Peers held the 2014 mode of access constant for future forecasts. However, even in 2012 when fewer Metro rail stations were open than at present, Metro's intercept survey data for Dodger Stadium Express riders indicated that 88% of riders arrived via transit, walking, or biking.

Additionally, in contrast to systemwide bus ridership, which represents the vast majority of ridership decline as noted in the SCAG/UCLA study referenced by the commenter, ridership on the Dodger Stadium Express has grown considerably within the same time period indicating strong and growing demand for transit travel between LAUS and Dodger Stadium. As indicated by Metro "In 2010, the [Dodger Stadium Express] service's first year, 122,273 passengers rode the DSE to Dodger Stadium. By 2019, the passenger count increased to 307,124. This is a 250% increase over the service's first year."[64]

Comment GO17-200 A defining attribute of regular transit riders is their relative lack of private vehicle access. Between 200 and 2015, households in the SCAG region, and especially lower-

[64] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2021. Metro Final Report: MSRC Contract MS21001 Dodger Stadium Express 2019 Season. Available at http://www.cleantransportationfunding.org/sites/default/files/projects-final-reports-2020-04/MS21001_Metro_Dodgers_Final_Report.pdf. Accessed August 2023.

income households, dramatically increased their levels of vehicle ownership. Census data show that from 1990 to 2000, the region added 1.8 million people but only 456,00 vehicles (or 0.25 vehicles per new resident). From 2000 to 2015, the SCAG region added 2.3 million people and 2.1 million vehicles (or 0.95 vehicles per new resident). The results strongly indicated that increasing private vehicle access helped depress transit ridership. Further car ownership gas grown fastest among the most frequent transit riders.

From 2012 to 2016 the SCAG lost 72 million annual rides on public transportation. In addition, while fares on LA Metro's trains and bus have decreased, ridership has also decreased.[4]

Footnote 4: California Transit Association, Ridership Study Revisited, Stephanie Jordan. Available at: https://caltransit.org/news-publications/publications/transit-california/transit-california-archives/2019-editions/may/ridership-study-revisited/

Response GO17-200 Refer to Response GO17-199 for a discussion of the proposed Project's estimated ridership model, and how the measured ridership growth in the Dodger Stadium Express in contrast to systemwide bus ridership has declined, indicating strong and growing demand for transit connections between Dodger Stadium and Los Angeles Union Station.

Comment GO17-201 The Green Power for Green LA program gives LADWP customers the opportunity to replace electricity from polluting power plants with energy generated from renewable resources like sun, wind and water. For a slightly higher price than power generated from conventional sources such as coal and oil, the program allows residential customers to choose 100 percent renewable energy with 20 percent coming from new sources. The Green Power for a Green LA Program has been offered since May 1999.

Response GO17-201 The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment to further demonstrate the proposed Project's leadership towards sustainable transportation. An addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Comment Letter GO18 – Coalition for a Safe Community, Dr Clyde T. Williams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO18

Comment GO18-1 Project description, assessments, and alternatives considerations are totally inadequate and incomplete and without engineering and construction considerations and descriptions. Many references mention future studies, engineering, and designs to be done before construction, but all such would be without public review and comments and thereby not in compliance with CEQA.

Response GO18-1 Section 2.0, Project Description, of the Draft EIR, included a description of the proposed Project construction, and the potential effects of the proposed Project construction are evaluated throughout Section 3.0, Environmental Setting, Impacts, and Mitigation. The detailed construction assumptions for the proposed Project are set forth in Appendix B, Construction Assumptions, of the Draft EIR. The level of detail and specificity for an EIR should correspond with the nature of the project and the degree of specificity involved in the underlying project (14 Cal. Code Regs. § 15146). CEQA does not require that detailed engineering plans be prepared or circulated publicly for review and comment. The information set forth in the Draft EIR concerning the proposed Project complies with CEQA's requirements.

Environmental review under CEQA is encouraged to occur as early as feasible in the planning process (14 Cal. Code Regs. § 15004). As such, it is common for an EIR to identify the requirement for more detailed design and engineering studies that must occur prior to construction reflecting the further advanced project design and on the ground environmental conditions at the time of construction. Refer also to Topical Response I: Use of Project Design Features and Plans in Mitigation Measures.

Comment GO18-2 Although Goals/Purposes and Objectives are required for a DEIR, this DEIR provides vague and ambiguous descriptions and totally inadequate development of the Project, its objectives, and its alternatives and their numerical/quantified comparisons. Thus, the discussion of alternatives and Project and their numerical/quantified comparisons are totally inadequate.

Response GO18-2 The Draft EIR addressed the Project Objectives and the Project Description in Section 2.0, Project Description. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Also refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA.

Comment GO18-3 Although directly related to the DEIR descriptions and assessments, the DEIR does not even minimally use/mention the LA City Department of City Planning database, ZIMAS, which must be fully incorporated if the Project is to be placed within the City of Los Angeles. As no Memorandum of Understanding or Agreement between the sponsor, Metro, and City of Los Angeles is provided or even mentioned, this absence is understandable avoidance, but renders the DEIR unacceptable, incomplete, and inadequate.

Response GO18-3 The City of Los Angeles Zone Information and Map Access System (ZIMAS) is a web-based mapping application that links together maps and databases designed to provide zoning related information for specified properties located in the City.[65] ZIMAS is not a distinct land use plan or zoning document. Refer to Section 3.11, Land Use and Planning, for discussion of the proposed Project's potential impacts to land use and consistency with relevant land use plans, policies, and regulations adopted for the purpose of avoiding environmental effects, including City of Los Angeles land use plans, policies, and regulations. The Draft EIR appropriately relies on a comprehensive list of resources listed in Section 9.0, References, of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO18-4 Without an adequate and complete DEIR, alternatives to the proposed Project cannot be adequately formed and compared. Thereby the consideration of alternative cannot be considered adequate nor complete, but should include ZE/NG buses and dedicated bus lanes and perhaps with congestion pricing for DTLA and the Project site.

Response GO18-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. An EIR need not consider every conceivable alternative. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would

[65] City of Los Angeles. ZIMAS User Guide. Available at: http://zimas.lacity.org/webhelp/pdf/ZimasUserGuide.pdf. Accessed September 2023.

provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment GO18-5 For detailed comments see below, including pertinent identified portions of the DEIR with highlighted issues of the current texts for the specific comments.

ES-1/3 When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

5000passengers/hr and 40p/gondola = 125 gondolas(g)/hr = 1 g/29 sec

Travel ROT = 14 min including loading/unloading = 3 sec/person x 40 = 120 sec = 7min transit + 2 min ld/uld = 60/9 = 7 g-trips/hr x 40pgr = 280 total passenger/hr

x 2 hr = 560 p/game – nine/9 gondolas/cabins operating each game/event

Provide Project operations for peak passenger processing and gondola travel for 2 hours prior to Stadium events.

Provide seating/standing design floor capacity for each gondola/cabin used for Project's process flow and movements.

Provide total weight of all loaded gondolas and angular load distribution for each tower (one way loaded/opposite way unloaded).

Response GO18-5 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-6 ES-2/3 The standards of adequacy of an EIR, defined by Section 15151 of the CEQA Guidelines, are as follows:

An EIR should be prepared with sufficient level of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effect of the proposed project need not be exhaustive, but sufficiency of an EIR is to be reviewed in light of what is reasonably feasible….The courts have not looked for perfection but for adequacy, completeness, and good faith effort at full disclosure.

First of 79 mentions of feasible, vs financial and fiscal of <10, and must be considered as an acceptable alternative for costs. Provide "costs" comparisons for each use of "feasible" or "fiscal" and for alternatives throughout the DEIR.

Provide documentation of database for the "analysis" and numerical/quantified assessments and comparisons in table forms.

Provide Project definitions and demonstrations of feasible and infeasible conditions within the Project. Definitions of feasible commonly include "practical" issues, costs, funding, probability of changed conditions, and unexpected costs for safety, hazards, and changed conditions claims.

Overall the DEIR is inadequate and incomplete for reasonably public accessible considerations (review and comments) of the Project, its impacts, mitigations, and alternatives.

Lack of use of LACity-DCP-ZIMAS database for issues along the entire route and for specific facilities located along the route. Provide ZIMAS database for any DEIR references to equivalent data from elsewhere, e.g., seismicity, landslide, liquefaction, etc..

Response GO18-6 The comment provides a recitation and characterization regarding the standards of adequacy for an EIR. The issues raised in this comment related to particular impact areas studied in the Draft EIR are provided below in Responses GO18-7 through GO18-120. The general comments regarding the adequacy of the Draft EIR are either not specific to the analysis contained within the Draft EIR or are requesting formatting and content beyond what CEQA requires. Refer to Response GO18-3 regarding ZIMAS.

Comment GO18-7 ES-3/4 The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium, and would provide safe, zero-emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Provide engineering design drawings and calculations and all derived assessment of engineering forces on towers and cableway given the imbalance of cabin loads during specially events with no passengers on one side and full capacity loads on the opposing cableways.

Response GO18-7 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR, for a description of the proposed Project system, including its design and cables and ropeway technology. The proposed Project would be designed to operate safely with loads which are imbalanced, consistent with comparable aerial transit systems. Ski lifts, for example, are routinely designed for loads which are imbalanced, as the majority of passengers ride uphill and nearly no passengers ride downhill. Designing for this imbalance, as well as other operating and non-operating conditions, involves a variety of load scenarios which would be completed at future design stages of the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment GO18-8 ES-4/2 The proposed Project "alignment" includes the suspended above-grade cables and cabins following the position of the Project components along the ART route….

Provide assessment of engineering forces on towers and cableway given the imbalance of cabin loads during specially events with no passengers on one side and full capacity loads on the opposing cableways.

Response GO18-8 This comment provides a general recitation and characterization of text from the Draft EIR. Further, CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Nevertheless, refer to Response GO18-7 for a discussion of the proposed Project's design considerations.

Comment GO18-9 ES-4/4 When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Provide Gondola loading/unloading/travel timing cycles as part of the overall 23 second/7 minute travel patterns including a time chart for each cycle element.

e.g., Loading/unloading 3 sec / passenger 40p/g = 120sec each for loading and unloading

Provide same cycles including 10% ADA passengers.

Response GO18-9 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

Comment GO18-10 ES-4/7 The alignment then crosses over the western edge of the Los Angeles State Historic Park and the Metro L Line (Gold) tracks.

No mention of Buena Vista til pg.3.11/20. Provide currently proposed building outlines for both ground area and heights compared to this Project along with full cabin presents during target events.

Response GO18-10 This comment provides a general recitation and characterization of text from the Draft EIR. The proposed Buena Vista project is discussed as a related project in Section 5.0, Other CEQA Considerations, of the Draft EIR. Refer to Table 5-1: Related Projects and Figure 5-1: Related Projects Map. As discussed in Section 5.0, the list of related projects includes projects that are anticipated to be constructed during the same timeframe as the proposed Project and operational at the same time as the proposed Project. The list of related projects is derived from information provided by the City of Los Angeles Department of City Planning and the Los Angeles Department of Transportation (LADOT). The proposed Buena Vista Project was also addressed in several sections of the Draft EIR, including Section 3.11, Land Use and Planning, and Section 4.0, Alternatives. Section 5.2, Cumulative Impacts, discusses potential cumulative impacts of the proposed Project and the related projects, including the proposed Buena Vista project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided

sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO18-11 ES-10/2 The Dodger Stadium Station….The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger Stadium Station to include a mobility hub…to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

No specific design or drawings are provided for the mobility hub or for the access to surrounding neighborhoods, and no beneficial effects are proposed for such a hub and accesses. No proposed schedules for LA ART are proposed for daily services, frequencies and loads or for pedestrian/bike/handicapped movements from/to hub and the neighborhoods.

Provide Daily and Daytime schedules, frequencies, and ridership access for non-games days public access.

Provide definition of specific considerations by LAD for non-game day operations and riderships.

Response GO18-11 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR for Figure 2-32: Dodger Stadium Station Buildout Conditions, which shows the buildout conditions for Dodger Stadium Station, including the mobility hub, pedestrian esplanade, and landscape improvements. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity

depending on ridership. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd), and the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). As discussed in Section 5.0, Corrections and Additions, of this Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first / last mile multi-modal options, such as a bike share program.

CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-12 ES-10/6 At the Chinatown/State Park Station, cabins would detach from the rope and decelerate to the station speed. Since passenger access would be provided at this station, the cabins would decelerate to about one foot per second (less than one mile per hour) and the doors would open.

Provide station speeds schedules and pathways other than zero/dead stop and temporal sequencing for unloading and reloading of 40 passenger each. Provide same for at least 10% ADA related passengers and seniors (65+yr olds).

Response GO18-12 This comment provides a general recitation and characterization of text from the Draft EIR. Further, refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of the safety features and operation of the proposed Project, including boarding and compliance with ADA requirements. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-13 ES-11/1 Operation of the proposed Project would require approximately 20 personnel. Station attendants would be located within each station to assure safe boarding or to execute stops, if necessary. Attendants would also provide customer

interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin.

Provide personnel/staffing levels for each Project element during an event operations. Provide for full element operations, e.g., three stations and as to any staff shifting during event operations, e.g., No staff at Park Station and rotating staffs for initial Alameda Out-bounds vs later Stadium outbounds.

Provide Gondola loading/unloading/travel timing cycles as part of the overall 23 second/7 minute travel patterns including a time chart for each cycle element e.g., Loading/unloading 3 sec / passenger 40p/g = 120sec each for loading and unloading

Provide same cycles including 10% ADA passengers.

Provide requirements for agent-initiated stoppage (=0.0fps).

Response GO18-13 This comment provides a general recitation and characterization of text from the Draft EIR. Further, refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd) and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-14 ES-13/2 The proposed Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features, as feasible. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to

outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers.

Provide definitions for sustainable (40+ years operations) and feasibility calculations.

Provide definition and design for cabin ventilation and for any station ventilation (e.g., fans).

Provide definitions and designs of Passive Ventilation and enclosing solar panels for shading.

Response GO18-14 This comment provides a general recitation and characterization of text from the Draft EIR. A comprehensive list of the proposed Project's sustainability features, including the sources from which they were drawn, is provided in Section 2.7.9, Sustainability Features, of Section 2.0, Project Description, of the Draft EIR. Cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. As a sustainability feature, the stations, junctions, and boarding platforms of the proposed Project would be designed to be open air, allowing for natural ventilation and natural daylighting. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-15 ES-13/3 Materials for the stations, junction, and towers would be locally sourced where possible, and would include recycled content where possible.

Provide conditions for "possible" sourcing and recycled contents, rather than "where feasible".

Response GO18-15 This comment provides a general recitation and characterization of text from the Draft EIR. A comprehensive list of the proposed Project's sustainability features, including the sources from which they were drawn, is provided in Section 2.7.9, Sustainability Features, of Section 2.0, Project Description, of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-16 ES-14 Table ES-1: Proposed Project Construction

Maximum Depth of Drilled Piles Maximum Depth below pile cap

Clarify Maximum depth of pile tip = 10ft + 120ft bpc = 130ft bgs

Maximum Depth of Excavation Provide Maximum Depth to base of pile cap and top of pile

Amount of Excavation

Provide excavation volume including bulking for pile cap, 10ft depth = 3 cuyd/sq yd plus times surface area.

Provide piles boring/auguring volumes for all Project stations, towers, and junction e.g., = 1 yds x 40yd = 40 cu yd/pile x 25-40 piles = 1000-1600 cu yd, Stn Pile 55-80-125 Exc 2700-6300 cuyd, and Twr Pile 120-125 Exc 1300-6400 cuyd.

Provide clarifications regarding pile depth below ground levels vs pile lengths (feet and below pile cap bottom/floor.

Response GO18-16 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR for discussion of construction assumptions, including drilled piles and excavation, of the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-17 ES-19/1 Furthermore, the existing DSE service operates up to 8 buses per hour, while the TSM Alternative would require 77 buses per hour.

Based on 5000-6000 passengers/hour, bus loads would be 65-80 passengers (sitting and standing). Provide a round trip flow chart and process flow (in seconds) including times for unloading/loading, start up and stopping times, and travel times (loaded and unloaded).

Provide comparative table for both cabin- and bus-based alternatives, especially for unloading/loading of single-door-cabins vs double-door-buses and for total cabin/bus seated/standing capacities.

Provide calculations and design requirements for bus-only lane access to Stadium Station site. Provide a Project Alternative and comparisons for single- vs double door

cabins/gondolas along with examples of existing operational double-door ART systems worldwide.

Response GO18-17 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a reasonable range of alternatives pursuant to CEQA Guidelines section 15126.6(a), and how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. CEQA does not require the consideration of alternatives to a component of a project, such as the variations on cabins suggested in this comment, and instead should focus on alternatives to a project as a whole. Further, CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-18 ES-19/4 Of the alternatives analyzed in this Draft EIR,…Although the No Project Alternative would not meet any of the Project Objectives, it would avoid all of the Project's significant impacts, including the Project's significant and unavoidable construction noise and vibration impacts. Conversely, the No Project Alternative would not result in ART connections between the neighborhoods noted above.

Additionally, VMT and vehicle congestion would not be reduced, and the associated reduction in GHG emissions and air quality improvements would not take place.

Provide non-game days road transportation equivalent to that of the Project. Assume all electric buses with solar shade panels on buses and transit stops.

Response GO18-18 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the environmental benefits of the proposed Project would not be realized through the "No Project Alternative." CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided

sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-19 ES-19/5 Because the TSM Alternative would also avoid the Project's significant and unavoidable impact with respect to construction noise and vibration without the need for mitigation, and would reduce the range of impacts to the greatest extent listed in Table 4-3, it is deemed the Environmentally Superior Alternative. However, the TSM Alternative would not meet the majority of the Project's Objectives in full or in part. Conversely, the Spring Street Alignment Alterative would meet all of the Project Objectives.

Provide comparisons of TSM and proposed Project numerical rankings for each Project Objective. Provide required mitigations for full or equivalent compliance for each objective compared to the proposed Project alternative configuration.

Response GO18-19 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 4.0, Alternatives, of the Draft EIR for an analysis of how well the proposed Project and each alternative, including the Transportation Systems Management Alternative, would fulfill the Project Objectives and for a summary of the same in Table 4-1: Alternatives Conformance with Objectives. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-20 ES-22 - ES-84/Table ES-2: Summary of Environmental Impacts

No references to sections/pages/paragraphs.

Project Design Feature(s) (PDF) and/or Mitigation Measure(s) (MM) without clear references within 62 pages of text tables and columns.

Table provisions are inadequate, incomplete, and unrelatable to the DEIR for public review and comments. Provide revised table including specific page/paragraph references to Project and alternatives descriptions.

Response GO18-20 This comment provides a general recitation and characterization of text from the Draft EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. The purpose of Table ES-2 is to provide a summary of the environmental impacts identified in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-21 ES-29/4 ES 13. SUMMARY OF ENVIRONMENTAL IMPACTS Table ES-2 provides a summary of the environmental impacts of the proposed Project evaluated in this Draft EIR. Based on the analysis in Chapter 3.0, Environmental Impact Analysis, implementation of the proposed Project would result in significant and unavoidable impacts related to Noise and Vibration.

The Table is not coordinated and referenced with the text to assure consistency and thereby renders the table irrelevant, inadequate, and incomplete for public review and comments.

As indicated elsewhere below, significant, unavoidable, and unmitigated impacts would arise in the Hydrology, Geology, Visual, Aesthetics, and Services/Infrastructure elements of DTLA.

Provide a fully cross-referenced table with text citations to each sector, and clearly identify significant impacts and required mitigation/compensation.

Response GO18-21 This comment provides a general recitation and characterization of text from the Draft EIR. The purpose of Table ES-2 is to provide a summary of the environmental impacts identified in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. Section 3.0 examines the potential environmental effects associated with implementation of the proposed Project by issue area. As provided in Table ES-

2, Section 3.0, and Section 5.1, Significant and Unavoidable Adverse Impacts, of Section 5.0, Other CEQA Considerations of the Draft EIR, the only significant and unavoidable impacts associated with the proposed Project are related to construction noise and vibration (human annoyance). Refer to Section 3.13, Noise, of the Draft EIR for discussion of proposed Project mitigation measures applicable to construction noise and vibration. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-22 ES-29/5 Project Design Features (PDFs), while not necessary for the impact significance determination, are included in Table ES-2 because they are inherent in the design of the proposed Project. Best Management Practices, or other measures required by law and/or permit approvals, are also requirements of the proposed Project. Additionally, Mitigation Measures have been identified and are additional actions designed to avoid, minimize, or compensate for significant environmental impacts and are required where significant impacts have been identified based on the analyses in Chapter 3.0 of this document. Where applicable, Mitigation Measures are described on Table ES-2.

54 pages of Table ES-2, while not necessary, are confusing and distractive compared to Chapters 3 and 4 for public reviewing the EIR. Especially distractive when the DEIR repeatedly references preparation of future final design studies and documents and final design conditions based on further site conditions analyses, descriptions, and changes of Project design conditions.

Provide fully rectified/cross-referenced table or eliminate.

Response GO18-22 This comment provides a general recitation and characterization of text from the Draft EIR. Further, refer to Response GO18-21, and to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA. The Draft EIR includes 7,877 pages of detailed analysis from experts intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. The shorter executive summary, including the summary of the proposed Project's impacts analysis provided in Table ES-2, explains the Draft EIR's analysis and conclusions in clean and simple language for the public and decisionmakers. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for

the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-23 ES-30 – ES-84 – Table ES-2

No coordination of table summaries and texts (pages/paragraphs). Table is a morass of uncoordinated words in boxes and texts. Totally inadequate and incomplete for public review and comments and purposefully distractive and destructive of meaningful public review/comments.

Response GO18-23 Refer to Response GO18-20.

Comment GO18-24 ES-50 Table ES-2: Summary of Environmental Impacts Geology and Soils

MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report. The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). A site-specific geotechnical exploration program, along with associated laboratory testing, is necessary to complete a design-level evaluation of the geologic hazards and conditions, seismic hazards, grading conditions, and foundation capacities. The site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings, conclusions, and mitigation recommendations for potential geologic and seismic hazards;

and

design-level geotechnical recommendations in support of grading and foundation design….recommended measures to reduce potential impacts related to landslides, subsidence, liquefaction, differential settlement, expansive soils, soil corrosivity, or other potential ground failures induced by the proposed Project. …ES-51…The submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety. The Project Sponsor shall implement the recommendations contained in the approved report during project design and construction.

Geology and hazards/hazardous materials sections both reference the "Site Specific Final Geotechnical Report" which must be prepared and considered during final pre-construction stages and which will not be available for public review and comments.

This current discussion of impacts clearly is biased, vague, inadequate, and incomplete for descriptions and assessments and not provided by qualified specialists.

Provide a sites specific geotechnical report based on actual borehole and sediments/groundwater chemical analyses as part of a revised/subsequent Environmental Impact Report for the Project.

Current literature reviews and discussions do not include Metro's extensive experiences with soil and groundwater contamination experienced during construction of the Red Line Station at Union Station which required millions of additional change-order costs, major groundwater collection and treatment of contaminated groundwater. Then experiences indicated that methane, numerous hydrocarbons, and creosote had sources between Chavez and Broadway from oil fields, oil processing facilities, railroad yards, and railroad ties/wood soaking pits.

Provide review of existing conditions and potential impacts from foundations/pile caps, pile drilling, and pile placement/formation at each tower and project support features. Provide geotechnical/chemical composition testing and drilling/sampling in at least four borings per tower and revise the Project area description and impact assessment accordingly.

Response GO18-24 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measures GEO-A. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts with implementation of Mitigation Measures HAZ-A and HAZ-B. Also, CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-25 ES-52 A PRMMP shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring. The qualified paleontologist shall supervise the paleontological

monitor, who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist, and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials. If any paleontological materials are found, the paleontological monitor shall temporarily divert or redirect ground-disturbing activities in the area of the exposed fossil to facilitate evaluation, and if necessary, salvage. The paleontologist shall assess the discovered material(s) and provide a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Project Sponsor shall comply with the recommendations of the…53…evaluating paleontologist, and ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the paleontologist's satisfaction. If paleontological materials are found, the paleontologist shall prepare a report identifying the resource and the recommendations proposed and implemented, within 1 year of completion of the fieldwork. A copy of the report shall be submitted to the Los Angeles County Natural History Museum.

Compared to 6-37/1 "Mitigation Measures GEO-A (prepared a site-specific final geotechnical report) and GEO-B (prepare a paleontological resource monitoring and mitigation plan (PRMMP)) would also be implemented."

Unlike other future mitigation measures, the PRMMP is laced with "shall" rather than "would" although no such document is or would be available for public review and comments prior to approval of the Project by Metro Board. Provide all mitigation measures with "shall" and remove any conditional instructions as a required and dependent condition for all impact assessments. Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (S-DEIR) for public review and comments.

Response GO18-25 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR. The Mitigation Monitoring and Reporting Program will prescribe for agency enforcement of mitigation measures for the proposed Project, including Mitigation Measure GEO-B. Further, Mitigation Measure GEO-B prescribes the mandatory elements of the Paleontological Resources Monitoring and Mitigation

Plan (PRMMP), including what deposits and actions are subject to the plan, when monitoring is required, and how monitoring should be conducted. Mitigation Measure GEO-B further outlines potential steps for mitigation, and requires that the Project Sponsor comply the evaluating paleontologist's recommendations. No ground-disturbing activities may continue until these recommendations have been implemented to the paleontologist's satisfaction. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO18-26 ES-53 MM-HAZ-A: Prepare a Soil and Groundwater Management Plan. The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures are encountered during Project construction. The Soil and Groundwater Management Plan shall provide a summary of…54…the environmental conditions at each Project component site, including stations and towers.

The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater to classify them as either hazardous or non-hazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle.

Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations, and be protective of workers and the environment.

Unlike other future mitigation measures, the S&GWMP is laced with some "shall" and a "would", although no such document is or would be available for public review and comments prior to approval of the Project by Metro Board.

Provide a S&GWMP with all mitigation measures with "shall" and remove any conditional instructions as a required and dependent condition for all impact assessments.

Response GO18-26 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible

at the time of CEQA review. Nevertheless, refer to Section 5.0, Corrections and Additions, of the Final EIR, for a discussion of how in response to comments requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the Los Angeles Department of Building and Safety for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

Comment GO18-27 1-1/4 The aerial gondola system would consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Attempts to confirm passenger transport requires more specific information than provided, the DEIR is inadequate to confirm Project capacities and therefore is incomplete and inadequate for public review and comments.

Provide full engineering drawings for any type of gondolas to be used for this Project and demonstrate typical event passenger positions and the total number of passengers to be safely transported.

Provide a numerical and timed flow chart for passenger conveyance from Alameda to Stadium stations using 420 seconds for total trips (including loading/unloading, seating/standing, Park Station stops/goes and other identifiable activities).

Response GO18-27 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA also does not require "a lead agency to conduct every test or perform all research, study, and experimentation

recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-28 1-1/6 1.2 PURPOSE OF THIS DRAFT ENVIRONMENTAL IMPACT REPORT In accordance with Sections 15050 and 15367 of the CEQA Guidelines, Metro is the Lead Agency for the proposed Project, and has the principal responsibility for approving the proposed Project. This Draft EIR has been prepared for the following purposes:

Given the number of agencies involved in Project, absence of an Memorandum of Agreement/Understanding must be provided especially for the responsibilities and origins of design and engineering aspects, without such the DEIR is incomplete and inadequate for CEQA.

Provide MOA/MOU regarding Lead Agency agreement, parties, status, and responsibilities.

Provide MOA with LACity-DPW, DOT, DB&S.

Provide submission date for DEIR and NOA via SCH/OPR. NOP was issued to SCH but not so far for NOA/EIR.

Provide MOA of Metro and Calif. State Lands Commission.

Response GO18-28 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to the proposed Project's SB 44 website for documents related to the proposed Project, including the Notice of Availability (NOP) for the Draft EIR: https://laartsb44.net/#!/documents.https://laartsb44.net/#!/documents. The NOP for the proposed Project was released on October 1, 2020, and the Draft EIR for the proposed Project was released on October 17, 2022.

CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment GO18-29 1-2/2 • To inform public, agency decision makers and the public of the environmental effects of the proposed Project, including any significant environmental effects, as

well as possible ways to minimize those significant effects, and reasonable alternatives to the proposed Project.

- To enable Metro to consider environmental consequences when deciding whether to approve the proposed Project.

- To enable other responsible public agencies that must approve activities undertaken with respect to the proposed Project, including permits and other approvals, to consider the environmental effects of the proposed Project.

Given the number of agencies involved in Project, absence of an Memorandum of Agreement/Understanding must be provided especially for the responsibilities and origins of design and engineering aspects, without such the DEIR is incomplete and inadequate for CEQA.

Provide definitions and requirements for use of Possible vs Feasible,

Provide draft MMRP for summary of mitigation and enforcement.

Provide contracts (drafts of issued) for inspection and construction operations.

Provide drafts of Preliminary/Final Design Documents and their use in construction contracts.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-29 This comment provides a general recitation and characterization of text from the Draft EIR. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR for details on the proposed Project construction. The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-30 1-2/3 As described in CEQA and the CEQA Guidelines, lead agencies are charged with the duty to avoid or substantially lessen significant environmental impacts of a project, where feasible. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In discharging this duty, a lead agency has an obligation to balance the economic, social, technological, legal, and other benefits of a project against its significant unavoidable impacts on the environment. This Draft EIR is an informational document, designed to identify the potentially significant impacts of the proposed Project on the environment; to indicate the manner in which those significant impacts can be minimized; to identify reasonable and potentially feasible alternatives to the proposed Project that would avoid or reduce the significant impacts; and to identify any significant unavoidable adverse impacts that cannot be mitigated.

Provide Citations/References list including specific page and paragraph for each document reference.

Provide clear definition of feasible and economic benefits, including costs/financials/fiscal aspect and apply same to all aspects of the Project.

Provide financial assessments of all construction and operations activities and public/private cost/economic sharing/distributions.

Provide financial and economic analyses for first five years of operations after stated targets of event ridership are attained.

Provide summary list of all significant impacts based on current level of design and those following detailed construction design documentation.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-30 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 9.0, References, of the Draft EIR for a list of references. Refer to page ES-17, in the Executive Summary, and page 5-1, in Section 5.0, Other CEQA Considerations, of the Draft EIR, for a summary of significant and unavoidable impacts. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to

"provide all information requested by reviewers." (Id., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-31 1-2/4 1.3 CEQA RESPONSIBLE AND TRUSTEE AGENCIES

The information in this Draft EIR may also be used by other agencies involved with the Project that have a responsibility under CEQA, including but not limited to, the following:

• California Department of Parks and Recreation

• California Department of Transportation

• City of Los Angeles

Provide a list of all agency and the lead-agency agreements (MOA/MOU) and all assigned responsibilities for each and for Metro/MTA.

Provide all funding requirements and assignments for full implementation of construction and initial operations for each responsible agency.

Provide a list of organizations and assignees for LA City Boards/Commissions and Dept.s of Transportation, Building and Safety, and Public Works (City Engineer, Bureaus of Street Services and Engineering).

For CEQA OPR/SCH# SCH# 2020100007, Add County departments (DPW, DRP, LASD, etc).

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-31 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from responsible agencies for the proposed Project. Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. The County of Los Angeles is not a responsible agency for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code

Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-32 2-42/2 During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The cabins would move at a maximum speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins.

40 passengers/gondola loading in 19sec w/ 2sec / closing and opening doors = 4 pass/sec 40 out =10sec + 40 in = 9sec

Provide a quantified flowchart/model for a single RT Cabin travel with speeds and durations to confirm the stated speeds and headways, along with durations of travel, stopping/starting, loading/unloading, and total RT.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-32 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the710ublicc and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-33 2-9/5 2.3.6 Project Purpose, Need, and Objectives

Remove “Need” which is a federal NEPA replacement for Objective-CEQA, perhaps replace all “Purposes” with “Goals”.

2-10/1 2.3.7 Purpose and Need

2-12/1 Within two hours prior to the start of and after a game or event at Dodger Stadium, more than 10,000 people could be transported to the stadium via the proposed Project. The average attendance at a Dodger game was approximately 49,000 for the 2019 season.\18 Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro’s regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Remove “Need” which is a federal NEPA replacement for Objective-CEQA, perhaps replace all “Purposes” with “Goals”.

Response GO18-33 This comment provides a general recitation and characterization of text from the Draft EIR. The Draft EIR addressed the Purpose and Need for the proposed Project in Section 2.3.7 and the Project Objectives in Section 2.3.8. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project’s objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project’s fundamental purpose of providing a permanent transit connection to Dodger Stadium.

Comment GO18-34 2-12/4 2.3.8 Project Objectives

Provide clear and quantifiable definitions of Goals/Purposes, their directly related objectives, and the policies/programs related thereto for the specifics of this Project and its alternatives.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-34 This comment provides a general recitation and characterization of text from the Draft EIR. The Draft EIR addressed the Purpose and Need for the proposed Project in Section 2.3.7 and the Project Objectives in Section 2.3.8. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project’s objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project’s fundamental purpose of providing a permanent transit connection to Dodger Stadium. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project’s potential environmental impacts. CEQA does not require “a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters” and lead

agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-35 3.5-1/1 3.5 CULTURAL RESOURCES This section evaluates the potential impacts of the proposed Project as it relates to cultural resources, including built resources and archaeological resources. The analysis in this section is based in part on information contained in the Archaeological and Paleontological Resources Assessment for the…Project and the Historical Resource Technical Report for the…Project prepared for the proposed Project (Appendices F and G of this Draft EIR, respectively).

Provide specific page/par citations for all base information for this description and assessment. Provide a mandatory Mitigation, Monitoring, and Report Plan, including recovery of significant remains for all foundation and piling construction activities.

Response GO18-35 This comment provides a general recitation and characterization of text from the Draft EIR. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Mitigation for archaeological resources addresses the potential for encountering archaeological resources during ground disturbing construction activities (see, e.g., Mitigation Measures CUL-A, CUL-C, CUL-D, and CUL-E). Refer to Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR for the Mitigation Monitoring and Reporting Program. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-36 3.5-24/1 Overall, the mitigation measures discussed above would ensure that the proposed Project, when combined with other related projects, would not result in significant impacts to historic resources. Therefore, cumulative impacts with respect to historic resources would be less than significant.

No identification of "other related projects" has been provided related to either historic, archaeologic, or paleontological resources.

Use of conditionals for assurances is vague and uncommittable for this and any other environmental sector. Provide replacements of "shall" for all "would's".

Response GO18-36 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Table 5-1: Related Projects and Figure 5-1: Related Projects Map. As discussed in Section 5.0, the list of related projects includes projects that are anticipated to be constructed during the same timeframe as the proposed Project and operational at the same time as the proposed Project. The list of related projects is derived from information provided by the City of Los Angeles Department of City Planning and the Los Angeles Department of Transportation (LADOT). Refer to Section 5.2.5, Cultural Resources, of the Draft EIR, for discussion of cumulative impacts to cultural resources. Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts to paleontological resources upon implementation of Mitigation Measure GEO-B. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment GO18-37 3.7-1/3 Before a project can be permitted, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults capable of surface fault rupture. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault capable of surface fault rupture is found, a structure for human occupancy cannot be placed over the trace of the fault, and must be set back from the fault (generally 50 feet).\2 Because no active faults capable of surface rupture cross the Project alignment, a fault investigation is not required. The fault closest to the Project alignment is the Elysian Park fault. The Upper Elysian Park fault is a north-to-northeast–dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture, and therefore is not subject to the conditions of the Alquist-Priolo Act.

The Project is planned for elements (Stadium and Park Stations, Broadway Junction, & SR-110 Tower) to be located "Within Fault Zone" (ZIMAS) on the surface of the Upper Elysian Park Fault.

As a signatory agency for this Project, such assignment of seismic hazards to the ground for this Project must be considered reliable and worthy of evaluation and assessment.

The Project must provide a thorough review of the ZIMAS backup/-ground for the Upper Elysian Park Fault. Such review must be available for public review and

comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

Response GO18-37 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils upon implementation of Mitigation Measures GEO-A. Refer to Response GO18-3 regarding ZIMAS. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment GO18-38 3.7-11/1 Additionally, the Stadium Tower and Dodger Stadium Station sites are in a City-designated hillside area, which increases the sites' potential susceptibility to landslides.\16 Because of the steep slopes and high seismicity in the vicinity of the proposed Stadium Tower and the…Stadium Station, the potential for earthquake-induced slope failure could be considered moderate to high in the landslide hazard zone. FN\16 City of Los Angeles. Zone Information and Map Access (ZIMAS). Interactive map available at: http://zimas.lacity.org/. Accessed August 2022.

Provide map of "City-Designated Hillside Area" including various failure considerations mentioned and pertinent references for such. Such review must be provided for public review and comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

Response GO18-38 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR. Section 3.07 and Appendix I discuss the location of the Stadium Tower and Dodger Stadium Station in a City-designated hillside area for the purposes of evaluating their susceptibility to landslides. Further, Figure 3.7-2, Seismic Hazards with the Project Area, maps the earthquake-induced landslide zones in the proposed Project area. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test

or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id.*, § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-39 3.7-11/2 3.7.2.6 Subsidence Subsidence is the loss of surface elevation due to the removal of subsurface support. Subsidence is caused by the reduction of pore space in the ground that was formerly occupied by a fluid such as water or oil, caused by activities that contribute to the loss of support materials within the underlying soils, such as agricultural practices or the overdraft of an aquifer. The existing alluvium of the Project area is susceptible to collapse or settlements; therefore, there is a moderate potential for subsidence to occur.

No factual backup is provided for such statements, nor is any reference provided for both the alluvial and bedrock areas of the alignment.

Provide all LiDAR sources and topographic reference materials and conduct assessments of past and thereby potential future subsidence of ground surfaces along the alignment and at each ground facility to be constructed. Provide review of past and potentials for subsidences at all ground facilities sites, especially those within the Elysian Park Fault surface zones (ZIMAS).

Provide estimates of dewatering requirements for towers, junction, and stations.

Such assessments and reviews must be provided for public review and comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

Response GO18-39 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report of the Draft EIR for discussion of subsidence. As discussed in 3.07, Mitigation Measure GEO-A would require development of a site-specific geotechnical investigation and report that would include geotechnical recommendations for project design and construction based on grading conditions and foundation capacities, including an evaluation of risk of subsidence. The submittal and approval of the final geotechnical report would be a condition of the grading and construction permits issued by the City of Los Angeles and recommendations would be implemented during project design and construction. Also, refer to Section 3.10, Hydrology and Water Quality, for a discussion of groundwater. Based on groundwater depths, none of the proposed excavations for foundations are anticipated to encounter groundwater; however, removal of nuisance water that seeps into boreholes during construction may be required for the pile installations at each of the components. Groundwater may be encountered during installation of piles, and any nuisance water removed would need to be analyzed prior to disposal. CEQA does not require extensive detail beyond that

needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-40 3.7-8/1 The southern California area contains numerous active and potentially active earthquake faults….The Project site is not in a State of California Earthquake Fault Zone for known Holocene active faults capable of fault surface rupture, or in an Alquist-Priolo Earthquake Fault Zone.\13

The Project must provide a thorough review of the ZIMAS backup/-ground for the Upper Elysian Park Fault. Such review must be provided for public review and comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

Response GO18-40 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of the Elysian Park Fault. As discussed in Section 3.07, the Elysian Park Fault is not capable of producing surface rupture and the Alquist-Priolo Earthquake Fault Zoning Act is not applicable, including the requirement to prepare a geologic investigation. Refer to Response GO18-3 regarding ZIMAS. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-41 3.7-8/2 The fault closest to the Project site is the Elysian Park fault. According to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment. The Upper Elysian Park fault is a north-to-northeast–dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir [Monterey Park]. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture,….The Elysian Park thrust fault is considered to be seismogenic (capable of generating earthquakes) from a depth of approximately 2 miles below ground surface in the south-southwest, to approximately 10 miles below ground surface in the north-northeast.

Provide reference to USGS Quaternary fault and fold database.

The Project is planned and located for Project elements (Stadium and Park Stations, Broadway Junction, & SR-110 Tower) to be located "Within Fault Zone" (ZIMAS) on the surface of the Upper Elysian Park Fault.

As a signatory agency for this Project, such assignment of seismic hazards to the ground for this Project must be considered reliable and worthy of evaluation and assessment.

The Project must provide a thorough review of the ZIMAS backup/-ground for the Upper Elysian Park Fault. Such review must be available for public review and comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

All areas south of Broadway are indicated by ZIMAS as being subject to liquefaction during an earthquake. Provide all engineering design consideration for liquefaction, subsidence, and shaking from a 6.4 magnitude earthquake in the Upper Elysian Park Fault.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-41 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction, landslides, subsidence, and seismic shaking, upon implementation of Mitigation Measures GEO-A. As discussed on page 3.7-8 and page 17 of Appendix I, according to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment. This reference to the U.S. Geological Survey Quaternary fault and fold database on page 3.7-8 of Section 3.07 and page 17 of Appendix I, has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR. Refer to Response GO18-3 regarding ZIMAS.

In addition, the detailed construction assumptions for the proposed Project are set forth in Appendix B, Construction Assumptions, of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-42 3.7-11/2 3.7.2.6 Subsidence Subsidence is the loss of surface elevation due to the removal of subsurface support. Subsidence is caused by the reduction of pore space in the ground that was formerly occupied by a fluid such as water or oil, caused by activities that contribute to the loss of support materials within the underlying soils…. The existing alluvium of the Project area is susceptible to collapse or settlements; therefore, there is a moderate potential for subsidence to occur.

EIR does not mention any subsidence experienced over the Union Station and Los Angeles Oil Fields and their production.

As these fields and their underlying reservoirs were not subject to injection and other returns of fluids/pressures, subsidence would be assumed to be dominant, and the DEIR would be considered incomplete and inadequate.

Provide a review and engineering considerations for an earthquake on the Upper Elysian Park Fault and associated impacts from liquefaction and subsidence associated for the Project.

Response GO18-42 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to subsidence and liquefaction upon implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-43 3.7-11/4 The majority of the Project area is on the floodplain of the Los Angeles River and its tributaries: Cemetery Ravine, and Chavez Ravine. As shown in Figure 3.7-1, the geologic unit for the Project area is mapped as younger Quaternary alluvium, and consists of unconsolidated deposits of silt, sand, and gravel deposited relatively recently by the meandering Los Angeles River and its tributaries. The sediments were deposited during the Holocene, within the last approximately 11,700 years, and are

therefore too young to typically contain significant fossil deposits. Along the Los Angeles River, the younger Quaternary deposits can be tens of feet thick.

DEIR requires facts rather than conjecture and possibilities; DEIR requires borings and samplings at each tower/station/junction sites, and assessment of ages and potential scientific importance of fossil contained within each site.

Provide 1-4 borings for each construction site and assess for pollen, wood, micro-fossils, and bone fragments

Provide usage of consistent terms, younger Quaternary or Holocene or <11,700 years old, throughout the document. Encountering of any remains would be significant as Paleoindian deposits are known from more than 10,000 years old and associated with mammoth elephants.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Mitigation Measures GEO-A (prepared a site-specific final geotechnical report) and GEO-B (prepare a paleontological resource monitoring and mitigation plan (PRMMP)) would also be implemented.

Use of conditionals for mitigation renders the document inadequate. Provide an adequate and well-established MMP for paleontological and archaeological remains and include as required plans before certification of the CEQA documents and processes..

Response GO18-43 This comment provides a general recitation and characterization of text from the Draft EIR. The comment questions the consistent use of the terms "younger Quaternary or Holocene or <11,700 years old." The term "younger Quaternary" in the cited text describes how the term is employed in Figure 3.7-1. Figure 3.7-1 is based on Figure 3 in Appendix I, Los Angeles Aerial Rapid Transit Geotechnical Document in Support of the Environmental Impact Report. The data used in Figure 3 are derived from the Preliminary Geologic Map of the Los Angeles 30'x 60' Quadrangle, California, produced by the California Geological Survey. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to archaeological resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project. As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0,

Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Not only are the requested borings unnecessary to evaluate potential environmental impacts, such borings are impracticable. As discussed in Topical Response I, as noted on page 3.7-19, of Section 3.07, Geology and Soils, of the Draft EIR, "[c]onstruction work is anticipated to reach up to 125 feet in depth for installation of the piles and an excavation depth of up to 10 feet, except for at the proposed Dodger Stadium Station, which has an excavation depth of 42 feet." Therefore, monitoring described in Mitigation Measure GEO-B is appropriately reserved as part of the construction in order to avoid the need to excavate more than once in connection with the proposed Project. Likewise, as discussed in Section 3.09, Hazards and Hazardous Materials, Appendix K, Phase I Environmental Site Assessment, and Appendix L, Hydrology Technical Report, of the Draft EIR, the Draft EIR conducted an extensive preliminary investigation of the proposed Project's sites to determine whether the site exhibited contamination from hazardous materials or would otherwise have impacts to groundwater. Based on this investigation, the Draft EIR concluded that additional investigation may be appropriate, although a full investigation is impracticable at this time because the Project Sponsor does not have access agreements for all the underlying properties and would have to obtain these agreements prior to testing. Moreover, it is appropriate for the Project Sponsor to test soils for contamination at the time the soil is disturbed and properly handle and remove any contaminated soil or groundwater at this time for off-site disposal and/or recycling, as outlined in Mitigation Measure HAZ-A. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id.*, §15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-44 3.7-12/4 / 71/2 There are also significant fossil deposits in the Miocene Puente Formation near the Area of Direct Impacts. Northeast of the Area of Direct Impacts, near the intersection of North San Fernando Road and Humboldt Street, a fossil snake mackerel….At locality LACM 4967, just outside the Project area in Elysian Park, an extinct fossil herring (Clupea tiejei) was recovered. Fossil fish and marine mammals

are commonly found at localities in the Puente Formation, which is considered to have a high sensitivity for significant fossil remains.

Identify potential significant impacts for paleontological remains for the Broadway Junction, Tower, and Stadium Station construction and mitigation provided by an adequate MMP for paleontological resources and specifically for excavations and pile borings for these sites.

Provide for thorough investigation of boring samples for ostracodes, diatoms, and foraminifera within Project sites.

Provide results for potential and mitigation from Buena Vista Project investigations.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-44 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts to paleontological resources upon implementation of Mitigation Measure GEO-B. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified. Refer to Response GO18-43 for a discussion of why boring sampling for paleontological resources is impracticable at this juncture.

Comment GO18-45 3.7-14/1 As discussed above, the Elysian Park fault traverses the Project area; however, it is a blind thrust fault, which means it is not capable of surface fault rupture. Accordingly, the risk of surface rupture due to faulting is considered low. Construction of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts related to rupture of a known earthquake fault would be less than significant.

The EIR is totally inadequate and incomplete, as the City of Los Angeles ZIMAS (DCP) Database clearly designates northern half (north of College St. to Casanova St.) of the

Project route within the "Fault Zone" of the Upper Elysian Park North Fault in surface parcels.

As a signatory agency for this Project, such LA City assignment of seismic hazards to the ground for this Project must be considered reliable and worthy of evaluation and assessment.

The Project must provide a thorough review of the ZIMAS backup/-ground for the Upper Elysian Park Fault. Such review must be available for public review and comments under CEQA and therefore must be included in the supplemental/subsequent DEIR.

All areas south of Broadway are indicated by ZIMAS as being subject to liquefaction during an earthquake. Provide all engineering design consideration for liquefaction, subsidence, and shaking from a 6.4 magnitude earthquake in the Upper Elysian Park Fault.

Response GO18-45 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils, including liquefaction and subsidence, upon implementation of Mitigation Measure GEO-A. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials upon implementation of Mitigation Measures HAZ-A and HAZ-B. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-46 3.7-14/2 The Alameda Station,…are in an area mapped as potentially subject to liquefaction, as shown on Figure 3.7-2. The Stadium Tower and Dodger Stadium Station are approximately 20 feet and 60 feet from a mapped liquefaction zone, respectively.

The EIR is totally inadequate and incomplete, as the City of Los Angeles ZIMAS (DCP) Database clearly designates the parcel including the tower and station as being subject to landslides AND liquefaction and being within the "Fault Zone" for the Upper Elysian Park North Fault.

Response GO18-46 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils, including liquefaction and subsidence, upon implementation of Mitigation Measures GEO-A.

Comment GO18-47 3.7-14/2 Liquefaction-induced settlement can occur during a seismic event, but can also be exacerbated by increased loading during construction activities. Because there is potential for liquefaction-induced settlement and collapse during a strong to severe ground-shaking event, damage to on-site structures and infrastructure could occur during construction of the proposed Project. Therefore, impacts related to strong seismic ground shaking, seismic-related ground failure, and/or liquefaction during construction of the proposed Project would be potentially significant.

Seismic impacts on the Project facilities would be significant if occurring during construction but would even be more significant if occurring during operations and especially during a game day operations. Provide revised DEIR and add "operations" of at least 50 years. Provide Project safety and operations response plans to the DEIR and Mitigation, Monitoring and Report Plan.

Although stated as "potentially significant", the DEIR does not clearly identify such as significant, only noise and vibration. Revise throughout the DEIR to include seismic impacts as significant and provide for suitable mitigation measures in the subsequent/supplement DEIR when recirculated.

Response GO18-47 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils, including liquefaction and subsidence, upon implementation of Mitigation Measures GEO-A. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA.

The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified. This comment also does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO18-48 3.7-14/3 The proposed Project…would ensure structural integrity and safe construction. Additionally, Mitigation Measure GEO-A, development of a site-specific geotechnical investigation and report to be approved by the City of Los Angeles, would be required. The geotechnical investigation and report would include geotechnical recommendations for project design and construction. With compliance to existing standards and codes and implementation of Mitigation Measure GEO-A, impacts related to the strong seismic ground shaking, seismic-related ground failure, and/or liquefaction during construction of the proposed Project would be reduced to less than significant.

Conditional references and allusions to future studies and assessment cannot be considered as Project commitments especially as no design nor construction contract designs and specifications have been provided. Provide contract specifications and drawings to confirm “recommendations” will be incorporated into the Design and into the construction contract documents.

As the investigation, report, and recommendations are not part of the current DEIR, they cannot be considered in the review for completeness and adequacy and the potential for seismic related impacts must be considered significant and the DEIR must be considered as incomplete and inadequate.

Once provided, the DEIR must be recirculated as a supplement, subsequent DEIR for public review and comments.

Response GO18-48 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time

the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO18-49 3.7-15/1 Therefore, impacts related to earthquake-induced slope failure could be considered moderately significant to significant. However, compliance with existing laws and regulations, and implementation of Mitigation Measure GEO-A, requiring the development and implementation of geotechnical recommendations to be incorporated into the design plans and specifications, including applicable site stabilization based on grading conditions and foundation capacities, would prevent instability of the slope during construction, and reduce impacts to less than significant under the proposed Project.

Based on ZIMAS assignments of the Elysian Fault Zone. Provide description and assessment for facilities located in the LA City-documented fault zone and liquefaction/landslide risks.

Provide technical evaluation of current designs for a proposed 6.4 magnitude earthquake at >10,000 depth, and specifically the effects on a gondola with 40 passengers between Park Station and Broadway Tower.

As the investigation, report, and recommendations are not part of the current DEIR, they cannot be considered in the review for completeness and adequacy and the potential for seismic related impacts must be considered significant and the DEIR must be considered as incomplete and inadequate. Once provided, the DEIR maybe recirculated as a supplement, subsequent DEIR for public review and comments.

Response GO18-49 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed project would meet applicable standards, requirements, and building

codes and would have less than significant impacts related to seismic-related ground failures upon implementation of Mitigation Measure GEO-A, as well as for a discussion of regional seismic hazards and seismic hazards within the proposed Project area (depicted in Figure 3.7-2, Seismic Hazards within the Project Area). Section 3.7.1, Regulatory Setting, recognizes that the Elysian Park fault is the fault located closest to the Project alignment. The Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture. As discussed in Section 3.07, the proposed Project would result in less than significant impacts with mitigation for construction impacts and less than significant impacts for operational impacts related to the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefication or landslides. Refer to Response GO18-48 for a discussion of how mitigation measures may appropriately include additional studies, how CEQA does not require the EIR to include all information requested by commenters, and how recirculation or a supplemental or subsequent EIR is not required.

Comment GO18-50 3.7-15/3 In addition, the proposed Project would adhere to its Emergency Operations Plan, as described in Chapter 2, Project Description….would include emergency response protocols, and would state that in the event of a major earthquake, the system would be fully evacuated and shut down, and would not operate. The proposed Project would be designed and constructed in accordance with applicable building codes, and therefore would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides, and the impact would be less than significant.

No draft EOP has been provided and references to it are incomplete, inadequate, and conditional without any public review or comments. Provide a draft Emergency Operations/Response Plan within the EIR and recirculate EIR.

Provide definition of “potential”, “substantial”, and adverse effects.

As mentioned, once the system is shutdown, provide detailed response plan to remove 30-40 passengers from a gondola above the Park.

As the Plan, protocols, report, plans, designs, and recommendations are not part of the current DEIR, they cannot be considered in the review for completeness and adequacy and the potential for seismic related impacts must be considered significant and the DEIR must be considered as incomplete and inadequate. Once provided, the DEIR maybe recirculated as a supplement, subsequent DEIR for public review and comments.

Response GO18-50 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how

the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. Refer to Topical Response J, Gondola Design and Operations, for discussion of how an Evacuation Plan would be developed as part of the Emergency Operations Plan for the proposed Project. Refer to Section 3.07, Geology and Soils, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the structural design of the proposed Project's stations, junction, and towers would meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO18-51 3.7-19/5 Construction Impacts Less Than Significant Impact with Mitigation. Surface deposits in the majority of the proposed Project alignment and surrounding area consist of younger Quaternary alluvium deposited by the Los Angeles River. These deposits are younger than 10,000 years, and have a low probability of yielding scientifically significant fossils….deposits are underlain with older Quaternary

Alluvium and Miocene Monterey or Puente Formation, where fossils have been encountered at depths ranging from 35 feet to 100 feet at locations southeast and northeast of the Project site. An assessment of paleontological resources in the Project vicinity indicated that older Quaternary alluvium is expected to be present at differential depths in the Project area. Construction work is anticipated to reach up to 125 feet in depth for installation of the piles and an excavation depth of up to 10 feet, except for at the proposed Dodger Stadium Station, which has an excavation depth of 42 feet, and therefore may encounter paleontological deposits.

Differential/different spelling error for depths of pile cap block and tops of piles beneath the capping block.

Revise as pile-caps are estimated to be based at about 10ft below ground surface and piles extend from the base of the pile-cap to 125 ft below the base, = 135ft below ground surface.

Younger Quaternary (Holocene) deposits, south of Broadway, are known to contain "paleo-indian" remains and artifacts elsewhere in the US and California. Paleo-indian remains and artifacts could be encountered during pile borings. Similarly at depths of 5-feet and deeper American Indian remains and artifacts could be expected.

Provide for archaeological monitoring and protection programs for all foundation excavations and representative sampling of produced debris for all pile boring at all Project sites, and a special paleontologic and archaeologic monitoring program be required for the Stadium Station and SR- 110 Tower.

Response GO18-51 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the depth of the piles is not described relative to the ground surface but indicates that the piles would reach depths of 125 feet. The piles would be driven from excavation depths of 10 feet with the exception of Dodger Stadium, where the excavation depth would be 42 feet. Refer to Section 3.05, Cultural Resources, Section 3.07, Geology and Soils, and Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including paleontological resources, upon implementation of Mitigation Measures GEO-A and GEO-B. Further, as discussed in Section 3.5.6 of the Draft EIR, Mitigation Measure CUL-A provides for development of a Cultural Resources Monitoring and Mitigation Plan by a qualified archaeologist. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research,

study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-52 3.7-20/1 To avoid potentially high sensitivity areas for paleontological resources, or in the event paleontological resources are encountered, implementation of Mitigation Measure GEO-B would minimize impacts that would directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature. Mitigation Measure GEO-B would require the development of a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) to provide direction on the identification of high-sensitivity areas and appropriate monitoring, excavation, and preservation processes during construction excavation activities. With the implementation of Mitigation Measure GEO-B, impacts related to paleontological resources would be reduced to less than significant.

The Mitigation Measure requires additional studies before construction and development of a specific PRMMP monitoring and reporting plan to mitigate potential significant impacts for fossils.

A tentative "mitigation measure" does not provide adequate nor complete mitigation or compensation for potential paleontological impacts from excavations for towers and stations foundations and >100 borings for piles. Provide a draft PRMMP for all excavations deeper than 3ft and recirculate DEIR.

As no PRMMP is available for review, revision, and comments, the impacts on paleontological resources must be considered as greater than significant, or at least "significant". With the supplemental provision of the MMGeo-B and PRMMP, such impacts maybe mitigated but not without the full reports for public review and comments.

Response GO18-52 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for a discussion of how mitigation measures may appropriately include additional studies and how CEQA does not require the EIR to include all information requested by commenters. Refer to Response GO18-25 for further discussion of the sufficiency of Mitigation Measure GEO-B.

Comment GO18-53 3.7-20/3 3.7.5 Mitigation Measures The following mitigation measures are proposed to reduce significant impacts related to geology and soils to a level that is less than significant. MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report: The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended).

As proposed the provision of a future FINAL geotechnical investigation and report does not mitigate impacts and does not provide for public review and comments on the adequacy of the future document. Provide a site specific (for each excavation site) investigation and a Geotechnical Report based on at least four borings to the same or deeper depths than the proposed 100+foot soldier piles and recirculate the augmented DEIR for public review and comments.

Impacts on geological resources must be considered as greater than significant, or at least "significant" until such a report has been provided. With the supplemental provision of the MMGeo-B and PRMMP, such impacts maybe mitigated but not without the full reports for public review and comments. Geological impacts must be considered as significant until such a report is available.

Response GO18-53 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measures GEO-A. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Further, no feasible project alternative or mitigation measure considerably different from those previously analyzed in Section 4.0, Alternatives, of the Draft EIR, or outlined in Table ES-2, Summary of Environmental Impacts, of the Draft EIR, that could clearly lessen the proposed Project's environmental impacts has been proposed. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment GO18-54 3.7-21/2 Implementation of Mitigation Measure GEO-B would include the preparation of a PRMMP to provide direction on the identification of high sensitivity areas for paleontological resources and appropriate monitoring, excavation, and preservation processes during construction activities. Upon implementation of Mitigation Measures GEO-A and GEO-B, significant impacts related to geology and soils would be reduced to less than significant.

Therefore only after implementation of the MM-GEO-A/-B including their public presentation can impacts be considered "less than significant". Therefore the DEIR must be considered incomplete as the MM-GEO-A/-B have not been prepared, reviewed, nor implemented. Provide the mitigation monitoring and report plan for all

geological, paleontological, and archeological resources sectors along with mandatory requirements for agencies and contractors.

Provide complete and adequate MM-GEO-A/-B as part of the FEIR or as part of a SEIR.

Response GO18-54 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils and paleontology upon implementation of Mitigation Measures GEO-A and GEO-B. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-55 3.9-1/1 Hazards and Hazardous Materials This section evaluates the potential impacts related to hazards and hazardous materials from construction, operation, and maintenance of the proposed Project. This section is based in part on the Phase I Environmental Site Assessment (ESA) that was prepared for the proposed Project by AECOM in July 2022 (Appendix K of this Draft EIR). The environmental regulatory database report and records review prepared for the proposed Project in April 2022 is provided in Section 6 of Appendix K.

The ”database report” is not based on specific borings at the Project’s tower, junction, and station locations and in the vicinity of proposed foundation and piling sites for towers and stations. And thus the DEIR is inadequate and incomplete for the geotechnical setting of hazardous materials. The same situation occurred for the excavation of the Union Station and US-Yard tunnels which lead to major contaminations and massive change orders for mitigation of groundwater and soils

contaminations. Provide specific citations (appendix, page, and paragraphs) when referencing other sources and add such information herein.

Provide four borings and appropriate gas, fluids, and soil monitoring and samples for analyses of hazardous materials and potential impacts from such during excavations and boring at each of the Project tower/station sites prior to certification of the FEIR.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-55 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, and Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials upon implementation of Mitigation Measures HAZ-A and HAZ-B. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) Refer to Response GO18-43 for a discussion of why boring sampling for contamination is impracticable at this juncture. Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-56 3.9-10/1 City of Los Angeles Municipal Code The Los Angeles Municipal Code, Chapter IX (Building Regulations), Article 1 (Buildings), Division 71 (Methane Seepage Regulations), commonly known as the City Methane Ordinance *No references*, describes methane testing and control requirements based on building type, building use/occupation, and whether a structure is in a methane zone or buffer zone. Requirements for new construction in such zones include methane gas sampling; and depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts *No references*. The City has prepared a map of methane zones and methane buffer areas in the City *No references*. The proposed Project alignment crosses a methane zone and buffer zone and may require site-specific methane testing for particular structures, depending on the final architectural design.

Entire paragraph is incomplete and inadequate for this DEIR. No references/mentions (report/pg/par) are to given to ZIMAS where parcel-parcel notations are given as to presence in methane or buffer zones.

As known and designated gas zones lie within the Project area and construction site, methane gas issues must be considered significant and require an appropriate mitigation program in a supplemental/subsequent DEIR.

Provide for a thorough review and provisions of all relevant references are provided. Provide a gas survey of each site with gas probes/boring and their analyses and assessments. Provide such along with pertinent mitigation measures for a supplemental/subsequent DEIR.

Response GO18-56 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*. § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-57 3.9-10 22/6 Division 71 (Methane Seepage Regulations) describes methane testing and mitigation requirements based on building type, building use/occupation, and whether a structure is located within a methane zone or buffer zone. The proposed Project alignment crosses a methane zone and buffer zone and may require site-specific methane testing for particular structures, depending on the final architectural design.

As known and LA City designated gas zones lie beneath the Project area and construction sites, methane gas issues must be considered significant and require an appropriate mitigation program in a supplemental/subsequent DEIR.

Provide final Project designs and documents, their description, and their bases for draft Mitigation, Monitoring, and Reporting Plans for public review and comments prior to preparation of the Project FEIR.

Provide for a thorough review and provisions of all relevant references are provided. Provide a gas survey of each site with gas probes/boring and their analyses and

assessments. Provide such along with pertinent mitigation measures for a supplemental/subsequent DEIR.

Response GO18-57 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR for discussion of the construction of the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Finally, the CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-58 3.9-18/2 3 Methane Zones Methane zones are usually a result of naturally occurring tar and crude oil, or shallow soil contamination by old oil drilling wells….Non-pressurized methane is not normally problematic if properly monitored and controlled per Cal/OSHA regulations….Methane and associated oil field gas exposure to workers during construction can be hazardous at higher levels, especially in confined spaces. In addition, methane seepage can result in an explosion if an adequate concentration of methane gas exists where combustion is possible.

During 1985 Ross Dress for Less Store Explosion, RTD/Construction Management staff for Phase 1 Red Line assisted LAFD in monitoring, control, and treatment of methane leakage and fire and such activities laid base for the Methane Gas ordinances and restrictions.

Methane and Methane-buffer zones are identified for all Project sites, except for Alameda Station. Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-58 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting

data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. Refer to Figure 3.9-1, Methane Zones Within the Project Area, in Section 3.09 of the Draft EIR. As shown, Alameda Station is not located within a Methane Zone. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Finally, this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-59 3.9-18/3 Methane gas is known to be generated in the area. The City of Los Angeles Department of Building and Safety's Los Angeles Methane Zone Map categorizes two types of zones: Methane Zones and Methane Buffer Zones….based on the proximity to a methane gas source. According to the City of Los Angeles Department of Building and Safety maps, portions of the proposed Project alignment pass through identified Methane Zones and/or Methane Buffer Zones (Figure 3.9-1). The proposed Chinatown/State Park Station, Broadway Junction, Alpine Tower, and Stadium Tower are in a Methane Zone and/or Methane Buffer Zone.

RTD/MTA project experience of Red Line Phase 1 Union Station Tunnel/Station construction included major change orders for groundwater and methane, creosote, and hydrogen sulfide gases released from groundwater and dry soils.

Methane and Methane-buffer zones are identified for all Project sites, except for Alameda Station. Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in

methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-59 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. As indicated on page 3.9-18 to 3.9-19 of the Draft EIR, the City of Los Angeles Department of Building and Safety's Los Angeles Methane Zone Map lists and categorizes Methane Zones and Methane Buffer Zones. The proposed Project would be designed and constructed to comply with regulations of Division 71 of the Los Angeles Municipal Code. Compliance with Division 71 Section 91.7104.1, which includes appropriate methane exposure or release identification protocols based on a site-specific evaluation of the risk during construction, would be required to ensure worker health and safe construction as applicable. Anecdotal information regarding an unrelated project is noted for the record. Refer to Response GO18-58 for discussion of how an MMRP is not required to be provided with the Draft EIR under CEQA, but has been provided with the Final EIR. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-60 3.9-19/Fig.3.9-1: Methane Zones Within the Project Area

No source for figure is provided as reference and hazard zone seems different from CalGEM boundaries for the Los Angeles Oil Field, and map appears to also differ from parcel designations in ZIMAS. Provide references for all gas issues.

Provide sources and analyses for development of map. Provide comparison with ZIMAS and basis for comparisons and mitigative requirements for safe construction of the Project.

Response GO18-60 Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. As stated on page 3.9-19, Figure 3.9-1, Methane Zones Within the Project Area, is a City of Los Angeles Department of Building and Safety map, which lists and categorizes Methane Zones and Methane Buffer Zones. As stated on page 42 of Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, this information was

referenced on March 31, 2022 from the City of Los Angeles (2004). Refer to Response GO18-3 regarding ZIMAS. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-61 3.9-26/3 As shown in Figure 3.9-1,…portions of the proposed Project alignment pass through Methane Zones and/or Methane Buffer Zones….Chinatown/State Park Station, Broadway Junction, Alpine Tower, and Stadium Tower are in a Methane Zone and/or Methane Buffer Zone….usually a result of naturally occurring tar and crude oil, or shallow soil contamination by old oil-drilling wells. Non-pressurized methane is not normally problematic if properly monitored and controlled…. If the gas accumulates to high concentrations and becomes pressurized, detectable levels may enter the interior of a structure through cracks or other penetrations present in floor slabs.

Given methane's buoyancy, the gas must be pressurized or contained or released in massive volumes in order to reach monitorable levels. Provide MTA/Metro action levels for construction sites and for publicly occupied/used areas, e.g., gas alarm levels for Red Line tunnel, Union Station-Civic Center.

Provide borehole monitoring for 24 hours and of at least borings within the excavation areas for stations, junction, and towers.

Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-61 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. Refer to Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of Metro/MTA construction sites. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the

time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented. Furthermore, per section 15097(a) of the CEQA Guidelines, the preparation of an MMRP is required only when a public agency has made findings related to an EIR in conjunction with approving a project. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-62 3.9-26/4 Methane exposure to workers during construction can be hazardous at higher levels, especially in confined spaces. In addition, methane seepage can result in an explosion if an adequate concentration of methane gas exists where combustion is possible. The anticipated construction methods for the proposed Project involve relatively shallow and wide excavations and would not be considered confined spaces; therefore, this reduces the likelihood of construction workers being exposed to methane gas concentrations that would be hazardous due to inhalation. Further, construction activities and workers would be required to comply with OSHA and Cal/OSHA regulations, including but not limited to 29 CFR Section 1926.55 and 8 CCR Section 5416, to develop and enforce workplace safety standards and ensure worker safety during construction, and project contractors would be required to comply with OSHA and Cal/OSHA regulations regarding any potential construction activities that may cause methane release.

Provide approved MTA construction requirements for methane and exposure. Provide for mandatory requirements and enforceable statements of certainty rather than "would", "could", or "should".

Provide borehole monitoring for 24 hours and of at least borings within the excavation areas for stations, junction, and towers.

Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-62 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the proposed Project relative to Methane Zones and Methane Buffer Zones and for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) Refer also to Response GO18-61 for further discussion of when an MMRP is required. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA

Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented. Furthermore, per section 15097(a) of the CEQA Guidelines, the preparation of an MMRP is required only when a public agency has made findings related to an EIR in conjunction with approving a project. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-63 3.9-27/1 The proposed Project would also be required to be designed and constructed to comply with the regulations…. Compliance…which includes appropriate methane exposure or release identification protocols based on a site-specific evaluation of the risk during construction, would be required to ensure worker health and safe construction.

Recognition of a potential threat/risk has not led to provision of a Methane Plan/Protocol presented in the DEIR.

As the project has not been designed, provide a thorough investigation and appropriate gas control designs to avoid/treat methane and other heavier hydrocarbon gases (e.g., BTEX and PAHs) and perhaps contaminated soils before construction begin, during construction, and for operations.

Following review and assessment of methane monitoring, provide appropriate protocols for mitigation of methane exposures and appropriate assessment of hazards and impacts upon the Project and environment. Integrate findings, mitigations, and residual impacts for significance and in cooperate in a supplemental/subsequent DEIR and recirculate for public review and comments.

Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-63 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Responses GO18-61 and GO18-62 for further discussion of Methane Zones and Methane Buffer Zones, as well as the proposed Project's MMRP.

Comment GO18-64 3.9-27/2 With adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, impacts related to methane gas exposure or release during construction of the proposed Project would be less than significant.

As no methane plan/protocol is presented in the Project, no adherence can be reviewed or assumed. Provide mandatory measures for gas controls, releases, and safe exposures.

Provide gas-vapor monitoring results from any/all geotechnical borings conducted to date. If no monitoring, provide for gas monitoring of soil vapors from at least 5 borings of 20ft into the underlying soils/alluvium with specific mandatory mitigation for all impacts.

Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-64 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Responses GO18-61 and GO18-62 for further discussion of Methane Zones and Methane Buffer Zones, as well as the proposed Project's MMRP.

Comment GO18-65 3.10-21/1 Groundwater levels in the Project study area generally range from depths of approximately 20 to 60 feet below ground surface (bgs).\37 \38 Groundwater levels range from 20 to 25 feet bgs in the vicinity of LAUS, 25 feet bgs near the intersection of North Alameda Street and North Main Street, 27 to 35 feet bgs in the vicinity of the southern portion of the Los Angeles State Historic Park, more than 60 feet bgs in the vicinity of the intersection of North Broadway and Bishops Road, and estimated at 60 feet bgs below the proposed Dodger Stadium Station.\39

\37 LACDPW. 2022. Groundwater Wells Online Data. Available at: https://dpw.lacounty.gov/general/wells/. Accessed May 2022.

\38 State Water Resources Control Board. 2022. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/, accessed May 2022.

\39 ENGEO Incorporated. September 2022. Los Angeles Aerial Rapid Transit Project Geotechnical Document in Support of the Environmental Impact Report.

No direct citations and cannot confirm/deny values given. Provide direct web address and process to locate values by page/paragraph/Figure No..

No map of groundwater level, sources of such information, nor the surface elevations. Provide map of elevations and depths to groundwater at 100ft intervals along proposed alignment.

Provide for and conduct preliminary groundwater characterization at each Project facility site based on at least four borings at each facility site with appropriate testing and monitoring for ground gases, contaminations, and water qualities for each site as part of supplemental review and assessment and then circulate a revised-subsequent/supplemental DEIR for public review and comments.

Revise/recirculate the DEIR based on significant impacts related to methane for the Project. Provide MMRP within the SDEIR for the Project sites in methane and methane-buffer zones based on gases found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-65 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Direct citations and documented values for water and groundwater have been drawn from Appendix L. As indicated beginning on page 3.10-18 of the Draft EIR, citations 27 through 39 provide data and mapping related to groundwater. As discussed on page 3.10-30 of the Draft EIR, the proposed Project would have less than significant impacts on sustainable groundwater management of the basin from construction activities. The proposed Project would include excavation and concrete work, and installation of drilled piles that would generate less than significant volumes of nuisance water. These activities would be limited to the construction phase only. Additionally, no large volumes of groundwater would be extracted that could decrease groundwater supplies. With adherence to existing regulations, potential impacts to groundwater supply and recharge during construction would be less than significant. As discussed on page 3.9-25, in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, further construction activities and workers would be required to comply with OSHA and Cal/OSHA regulations. As discussed on page 3.9-46, in Section 3.09, Hazards and Hazardous Materials of the Draft EIR, the Project Sponsor shall prepare a Soil and Groundwater Management Plan (Mitigation Measure HAZ-A) prior to re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater at identified Project component locations in order to classify soils and/or groundwater as hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures included in the Soil and Groundwater Management Plan shall be in accordance with current federal, State, and local regulations and be protective of workers and the environment. The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project was prepared consistent with the requirements of CEQA Guidelines section 15097. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are

not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. Release of a draft MMRP as part of the Draft EIR is not required under CEQA and an MMRP for the proposed Project will be prepared and adopted consistent with the requirements of CEQA Guidelines section 15097. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented. Refer to Responses GO18-61 and GO18-62 for further discussion of Methane Zones and Methane Buffer Zones, as well as the proposed Project's MMRP.

Comment GO18-66 3.10-21/2

Groundwater Quality Regional groundwater basin water quality is poor in some areas due to natural conditions resulting in high total dissolved solids (TDS) levels, while in other areas groundwater quality has been degraded due to infiltration from commercial and industrial discharges, agricultural chemical application, and contaminants from urban runoff. \40

Deterioration of water quality in some areas has occurred due to inadequate storage, handling, and disposal of chemicals resulting in releases to groundwater. The groundwater in the portions of the Central Basin is known to contain elevated levels of TDS, volatile organic chemicals, perchlorate, nitrate, iron, manganese, and chromium.\41 \40 Greater Los Angeles County Integrated Regional Water Management Region. 2014. The Greater Los Angeles County Integrated Regional Water Management Plan, 2013 Update. Available at: https://dpw.lacounty.gov/wmd/irwmp/FileList.aspx?path=docs\2014%20Public%20IRWMP%20Update, accessed May 2022.

\41 Ibid.

Citations are only to the general documents and do not lead to groundwater quality descriptions. Provide specific chapters, pages, and paragraphs to summary provided.

Provide Metro contracts and specific citations to Metro files for Red Line and Gold Line CEQA documents and construction files dealing with groundwater and water quality from Los Angeles Str. to Broadway.

Provide revised descriptions and assessments along with appropriate mitigation or compensation and then circulate a revised-subsequent/supplemental DEIR for public review and comments.

Revise/recirculate the DEIR based on significant impacts related to groundwater for the Project. Provide MMRP within the SDEIR for the Project sites in groundwater

zones based on chemical and gas found in soils/boring of each Project site for public review and comments of the recirculated DEIR.

Response GO18-66 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Response GO18-65 for further discussion of hydrology and water quality, as well as the proposed Project's MMRP.

Comment GO18-67 3.10-21/3 There are multiple records of sites in the Project study area at which commercial and industrial activities resulted in documented releases; these cases are generally overseen by the SWRCB, LARWQCB, and/or California Department of Toxic Substances Control (DTSC) cleanup programs.\42,\43 \42 State Water Resources Control Board. 2022. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/, accessed May 2022.

\43 California Department of Toxic Substances Control. 2022. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/.

Searches appear totally inadequate and incomplete with regard to Metro and City departments and relevant files related to Gold and Red Line construction along with the Park reviews.

Citations are only to the general document and do not lead to or support groundwater quality descriptions. Provide specific chapters, pages, and paragraphs to summary provided.

Provide Metro contracts and specific citations to Metro files for Red Line Station and US<>CC twin tunnels and Gold Line CEQA documents and construction files dealing with groundwater and water quality along the alignment from Los Angeles Str. to Broadway.

Provide revised descriptions and assessments along with appropriate mitigation or compensation and then circulate a revised-subsequent/supplemental DEIR for public review and comments.

Response GO18-67 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. As discussed on page 39 of Appendix L, Hydrology and Water Quality Technical Study, to the Draft EIR, specific files from Metro related to groundwater and water quality were accessed through databases such as Geotracker. Further, as indicated beginning on page 3.10-18, citations 27 through 39 provide data and mapping related to groundwater. Citations to general documents are sufficient because the reference documents were used holistically rather than for only specific

data. Moreover, CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-68 3.10-24/3 3.10.2 Methodology To establish baseline conditions, a search of publicly accessible databases and information from various sources and agencies was conducted….include but are not limited to the SWRCB, California DWR, State of California Natural Resources Agency, FEMA, Los Angeles RWQCB, Los Angeles County Department of Public Works, Los Angeles County Flood Control, City of Los Angeles Department of City Planning, LADWP, and Metropolitan Water District of Southern California.

Search appears totally inadequate and incomplete with regard to Metro and City departments and relevant files related to Gold and Red Line construction along with the Park reviews.

Provide Metro contracts and specific citations to Metro files for Red Line Station and US<>CC twin tunnels and Gold Line CEQA documents and construction files dealing with groundwater and water quality along the alignment from Los Angeles Str. to Broadway.

Provide accessible databases for roads and construction information along the proposed alignment for Department of Public Works (Bureaus of Engineering, Streets LA, Sanitation/Environment, etc.) and for Metro construction and CEQA related departments.

Provide revised descriptions and assessments along with appropriate mitigation or compensation and then circulate a revised-subsequent/supplemental DEIR for public review and comments.

Response GO18-68 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Response GO18-67 for discussion of how databases such as Geotracker were accessed as part of the Draft EIR. Refer to Appendix L, Section 3.0, Regulatory Setting, for the publicly available data sources and information, including

accessible databases for roads and construction information along the proposed alignment, reflected in the baseline methodology.

The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (14 Cal. Code Regs. § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-69 3.10-25/4 Construction Impacts Less Than Significant Impact. Construction of the proposed Project components would include site preparation and installation of foundations and columns; erection of stations, towers, and the junction; replacement or restoration of paving, sidewalk, and landscaping; and cable and cabin installation.

No design and related supportive studies/designs have been provided and references indicate none may exist and await final design. No foundation drawings are provided to establish how deep excavations and dewatering may be required. No specific locations and numbers of deep piles (mentioned to be >50ft depths) are located along with their capping foundations. Provide final design drawings and specifications for all towers and stations prior to approval and further considerations.

Current documentation is totally inadequate and incomplete for a pronouncement of "Less than Significant Impacts". Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Provide contract drawings and description and revised Supplemental EIR for public review and comments.

Response GO18-69 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Section 2.0, Project Description and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the proposed Project construction. Environmental review under CEQA is encouraged to occur as early as feasible in the planning process (CEQA Guidelines section 15004). As such, it is common for an EIR to identify the requirement for more detailed design and engineering studies that must occur prior to construction, reflecting the further advanced project design and on the ground environmental conditions at the time of construction. Refer to Table 2-4: Proposed Project Construction Details, on page 2-51 in Section 2.8, Construction, for details on piles and caps included in the proposed Project. Table 2-4 identifies the maximum depth of drilled piles, the maximum depth

of excavation, amount of excavation, and amount of materials exported. Refer also to Exhibit 1 in Appendix B, Construction Assumptions, of the Draft EIR. As shown therein, Appendix B maps the locations of all foundations and piles for construction of each component. Moreover, CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-70 3.10-25/5 Groundwater Construction activities associated with foundations would involve general earthwork and concrete work to prepare the foundations, with excavations for foundations at depths ranging between seven feet and 42 feet, and piles to be installed between 55 feet and 125 feet below pile depth….; therefore, the proposed Project may require the removal of nuisance water that seeps into boreholes during construction. Water removed from the boreholes would be containerized, and analyzed to determine the proper disposal method.

Provide pre-construction contract drawings of all foundations and pilings, especially for the Union Station facilities and their relation to the Un.Stn.<>Civic Center Tunnels and the groundwater levels (and copies of all boring records for the same).

Provide definition and differentiation between "nuisance" water and dewatered groundwater. Also provide definition of seeps, gal/min, and how big (provide dimensions) the "containers" would be.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-70 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Section 3.10.4, Environmental Impacts, of the Draft EIR, for discussion of groundwater. Refer to Exhibit 1 in Appendix B, Construction Assumptions, of the Draft EIR. As shown therein, Appendix B maps the locations of all foundations and piles for construction of each component. Refer to Section 3.10, Hydrology and Water Quality. Refer to Response GO18-39 for discussion of how based on groundwater depths, none of the proposed excavations for foundations are

anticipated to encounter groundwater. Furthermore, as stated in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, a Soil and Groundwater Management Plan would be prepared to specify methods for handling, sampling, and disposal of contaminated groundwater in the event it is encountered during construction (Mitigation Measure HAZ-A). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-71 3.10-25/6 Groundwater levels range from 20 to 25 feet bgs in the vicinity of LAUS. The foundations for the Alameda Station would be at a depth of 10 feet. Based on these anticipated depths to groundwater, it is considered unlikely groundwater would be encountered during construction of the foundations; however, piles would be drilled to 125 feet below pile depth, and may require removal of nuisance water that seeps into boreholes during installation of the piles of this station.

Provide pre-construction contract drawings of all foundations and pilings, especially for the Union Station facilities and their relation to the Un.Stn.<>Civic Center Tunnels and the groundwater levels (and copies of all boring records for the same).

Define: "drilled to 125 feet below pile depth" provide specific dimensions of below ground level or below foundation levels.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-71 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Table 2-4, Proposed Project Construction Details, in Section 2.0, Project Description, for maximum depth of drilled piles. Refer to Exhibit 1 in Appendix B, Construction Assumptions, of the Draft EIR. As shown therein, Appendix B maps the locations of all foundations and piles for construction of each component. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g.,

14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-72 3.10-26/1 Groundwater occurs at a depth of approximately 25 feet bgs near the intersection of North Alameda Street and North Main Street. The foundations for the Alameda Tower and the Alpine Tower would be at a depth of 10 feet….; however, piles for the Alameda Tower and the Alpine Tower would be drilled to 120 feet below pile depth, and may require removal of nuisance water that seeps into boreholes during installation of the piles of these towers.

Provide engineering considerations loads and dimensions for the Alameda/US Station and the higher angled Alameda and Alpine towers foundations.

Provide geotechnical boring logs and reports for each of the aerial structures considered.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-72 This comment provides a general recitation and characterization of text from the Draft EIR. The detailed construction assumptions for the proposed Project are set forth in Appendix B, Construction Assumptions, of the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-73 3.10-26/5 Based on groundwater depths, none of the proposed excavations for foundations are anticipated to encounter groundwater; however, removal of nuisance water that seeps into boreholes during construction may be required for the pile installations at each of the components.

Groundwater may be encountered during installation of piles, and any nuisance water removed would need to be analyzed prior to disposal.

Detections of total petroleum hydrocarbons TPH and volatile organic compounds VOCs including BTEX are known to be present in groundwater at the Los Angeles State Historic Park property, which is directly beneath the proposed Project alignment.\53 Although the groundwater quality in the remainder of the Project study area is not specifically known, it may contain elevated levels of constituents such as petroleum hydrocarbons and solvents resulting from commercial and industrial discharges, in addition to potentially elevated TDS and metals related to natural conditions. Uncontrolled discharge of groundwater carrying these potential pollutants could result in degradation of groundwater and surface water if it is not properly.

As pile boring will extend well below the top of groundwater, Provide two mitigations for hydrological impacts and potential water discharge violations for groundwater and nuisance waters removal, storage/monitoring for all VOCs, H2S, dioxin, creosote, and other chemicals encountered and treated for in construction for the Metro Union Station in 1980s.

RTD/MTA Red Line Union Station groundwater dewatering required aeration, activated carbon, and H2O2 treatments.

Provide all pile boring drilling systems with H2S and CH4 monitoring sensors and shutdown and require for monitoring, gas/liquids treatment and shutdown, if needed.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-73 Refer to Section 3.10, Hydrology and Water Quality, and Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Response GO18-39 for discussion of how based on groundwater depths, none of the proposed excavations for foundations are anticipated to encounter groundwater. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how Mitigation Measure HAZ-A, would require that a Soil and Groundwater Management Plan be prepared to sample and analyze soils and groundwater encountered during construction and would require the identification and implementation of methods and procedures necessary for proper handling and removal of impacted soils and/or groundwater for off-site disposal if required. CEQA

does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-74 3.10-27/1 Additionally, as stated in Section 3.9, Hazards and Hazardous Materials, a Soil and Groundwater Management Plan would be prepared to specify methods for handling and disposal in the event contaminated groundwater is encountered during construction. Because…, there is the potential that excavation in certain areas would encounter groundwater, and therefore, dewatering could be required….Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements….The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. If dewatering is required, the treatment and disposal of the removed water would occur in accordance with the requirements of LARWQCB's WDRs for Discharges of Groundwater….

As no specific plans have been prepared and presented in the DEIR, references to such is totally inadequate and incomplete and requires full presentation of such to establish adequacy and completeness of the assessment and mitigation. Provide a draft groundwater management plan for the Project and specific areas most probable to encounter groundwater in excavation and/or pile drilling for public review and comments.

None referenced/cited and no summary of conditions provided.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-74 As indicated in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, the Project Sponsor shall prepare the Soil and Groundwater Management Plan prior to re-grading, decommission, or construction activities. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Response GO18-39 for further discussion of groundwater. CEQA does not require extensive

detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-75 3.10-36/4 Nuisance groundwater may be encountered during installation of piles for each of the components, which may result in degradation of groundwater quality if not addressed properly….Refer to Section 3.9 (Hazards and Hazardous Materials) for additional details should contaminated groundwater and/or soil be encountered. However, construction activities are not anticipated to interfere substantially with groundwater recharge, groundwater resource supplies, or groundwater quality.

No definition nor reference is provided for "nuisance groundwater" and no relationships are provided regarding contamination of the groundwater, its recharge, supplies, and quality during Project construction. Provide definitions for "nuisance groundwater" and its expected characteristics and qualities. Provide a mitigation plan for its control and reduction of all impacts derived from its presence. Provide review and assess potential impacts of construction on the recharge, supplies, and quality of groundwater within and beneath the Project area.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-75 This comment provides a general recitation and characterization of text from the Draft EIR. As discussed on page 2 of Appendix L, Hydrology and Water Quality Technical Study, to the Draft EIR, nuisance water is water generated during construction that seeps into boreholes. As discussed in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, the Project Sponsor shall prepare the Soil and Groundwater Management Plan prior to re-grading, decommission, or construction activities. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater at identified Project component locations in order to classify soils and/or groundwater as hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be

developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. Refer also to Response GO18-73 above regarding this issue.

Comment GO18-76 3.10-36/6 With adherence to these laws and regulations, impacts related to implementation of a water quality control plan or sustainable groundwater management plan during construction would be less than significant.

Provide specific laws and regulations and the Project compliance measures with such and include in a specific plan with requirements for direct and continuing compliance with requirements on the part of the agencies and contractors. Provide such to be incorporated into all construction contracts along with specific documentation of measures and achievement of regulatory limits.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-76 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10.1, Regulatory Setting, of Section 3.10, Hydrology and Water Quality, for applicable laws and regulations applicable to hydrology and water quality. Applicable laws and regulations would include, but not be limited to, the Clean Water Act of 1972 (including 1977 and 1987 Amendments); Antidegradation Policy of 1968; Porter-Cologne Water Quality Control Act of 1969; State of California Antidegradation Polices – State Water Resources Control Board Resolution 68-16; 3.2.540 CFR 131.38 – California Toxics Rule; NPDES General Construction Permit regulations; MS4 Permit regulations; Los Angeles Regional Water Quality Control Board Basin Plan; City of Los Angeles General Plan; the City of Los Angeles LID Ordinance; the City of Los Angeles Municipal Code; the City of Los Angeles Water Quality Compliance Master Plan; and all other applicable regulations for all construction activities. The existing Construction Stormwater General Permit expired

on September 2, 2014, and is administratively extended until the effective date of a reissued permit. The proposed Project would comply with the statewide NPDES Construction General Permit (CGP) for stormwater discharges associated with construction activities in effect at the time of construction. In accordance with the CGP, the proposed Project Sponsor would be required to prepare and submit a construction Stormwater Pollution Prevention Plan (SWPPP) to the State Water Resources Control Board (SWRCB) prior to—and adhered to during—construction, as referenced in Appendix L, Section 3.0, Regulatory Setting (pages 16 to 24). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-77 3.10-37/1 As discussed above, the Sponsor would comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, water quality control and/or sustainable groundwater management plans, including the Basin Plan and City of Los Angeles General Plan, as well as commonly used industry standards.

As indicated the Basin Plan and appropriate sections of the LA General Plan are referenced but without any specifics as to what would mitigate this specific Project.

As indicate the Project would comply at some time in the future, supposedly before construction contracts, would be approved for construction but without public review and comments before sponsor and relevant authorities would certify completion of the CEQA process. Provide a specific groundwater plan for the Project and all elements specifically venturing into the groundwater resources of the Project area.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-77 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time

the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. As discussed in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, the Project Sponsor shall prepare the Soil and Groundwater Management Plan prior to re-grading, decommission, or construction activities. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater at identified Project component locations in order to classify soils and/or groundwater as hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-78 3.10-37/4 It would also comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, water quality control and/or sustainable groundwater management plans, including the Basin Plan and City of Los Angeles General Plan, the MS4 Permit, as well as commonly used industry standards.

Provide references (doc and page/paragraphs) for mentioned laws, regulations, and requirements.

Provide commonly used industry standards references (docs, pages, and paragraphs) and compiled regulations, laws, and standards requirements as a mandatory compliance mitigation measure.

Provide revised supplemental/subsequent DEIR for public review and comments.

Response GO18-78 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10.1, Regulatory Setting, for laws and regulations applicable to Hydrology and Water Quality. Refer to Response GO18-76 for discussion of applicable laws and regulations related to hydrology and water quality. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-79 3.10-38/2 With adherence to these laws and regulations, and groundwater management plans, impacts related to implementation of a water quality control plan or sustainable groundwater management plan during operations would be less than significant.

As no specific plans have been prepared and presented in the DEIR, references to such is totally inadequate and incomplete and requires full presentation of such to establish adequacy and completeness of the assessment and mitigation.

Provide differentiation between compliance and adherence and provide draft construction contract sections for both and for mitigation measures.

Provide a draft groundwater management plan for the Project and specific areas most probable to encounter groundwater in excavation and/or pile drilling for public review and comments.

Provide above in a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-79 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of the Soil and Groundwater Management Plan. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that

the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-80 3.10-38/3 3.10.5 Mitigation Measures With adherence to applicable federal, State, regional, and local laws and regulations, including compliance with applicable stormwater permits, wastewater permits, and other water quality regulations, construction and operation of the proposed Project would result in less than significant impacts to hydrology and water quality. No mitigation measures are required for the proposed Project.

Provide references (doc and page/paragraphs) for mentioned laws, regulations, permits, and their requirements.

Provide commonly used industry standards references (docs, pages, and paragraphs) and compiled regulations, laws, and standards requirements as a mandatory compliance mitigation measure.

Provide contractual requirements for all construction contracts and differentiate between requirements and mitigations.

Provide revised supplemental/subsequent DEIR for public review and comments.

Response GO18-80 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10.1, Regulatory Setting, of Section 3.10, Hydrology and Water Quality, for laws and regulations applicable to Hydrology and Water Quality. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-81 3.10-38/4 Mitigation Measures With adherence to applicable federal, State, regional, and local laws and regulations, including compliance with applicable stormwater permits, wastewater permits, and other water quality regulations, construction and operation of the proposed Project would result in less than significant impacts to hydrology and water quality. No mitigation measures are required for the proposed Project.

Provide references (doc and page/paragraphs) for mentioned laws, regulations, permits, and their requirements.

Provide commonly used industry standards references (docs, pages, and paragraphs) and compiled regulations, laws, and standards requirements as a mandatory compliance mitigation measure.

Provide contractual requirements for all construction contracts and differentiate between requirements and mitigations.

Provide revised supplemental/subsequent DEIR for public review and comments.

Repetitive comments as required by repetitive references and deficiencies.

Response GO18-81 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Responses GO18-76 through GO18-80 regarding applicable laws, regulations, and industry standards. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., §15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-82 Mineral Resources

3.12-2/2 The majority of wells in the Los Angeles City Oil Field, including the wells closest to the proposed Project alignment, are either plugged or idle. The nearest active well is approximately 1.5 miles west of the proposed Project alignment.\5

Provide a map of all known well sites within 1000ft of the Project excavations and provide and assess historic (1920-1950) aerial photos of the Project site for historic well sites and on-ground facilities which may have contaminated the Project sites. Assess potential impacts and provide specific mitigations for such, and recirculate the DEIR for further public review and comments.

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-82 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for Figure No. 7, Regional Oil Wells and Methane Zones. Refer to Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for analysis of historic well-sites and on-ground facilities. CEQA does not require extensive detail beyond that needed for evaluation and review of the

proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.). The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-83 3.12-3/3 Additionally, although the proposed Project alignment is in the Los Angeles City Oil Field, the closest active well is approximately 1.5 miles west of the proposed Project alignment, and would not be affected by implementation of the proposed Project. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or State, and no impact would occur.

Plugged and idled wells lie within 500ft of the Project surface footprint and within 1000ft of the Park Station and Broadway Tower. Plugged and idled wells can be easily renovated for production of mineral resources (oil and gas) and can impact the Project construction excavations. More than 50 idled but not plugged wells lie within 1/2mile of the Park Station, and idled (and even plugged) wells can be returned to service cheaply and within a matter of months.

Revise and provide adequate review and assessment of the Project on return to service of more than 50 idled wells to the west of Park Station. Provide a revised review and assessment of mineral resources in a revised and recirculated DEIR.

Response GO18-83 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.12, Mineral Resources, of the Draft EIR for discussion of how the proposed Project would not result in the loss of availability of a known mineral resource. The majority of wells in the Los Angeles City Oil Field, including the wells closest to the proposed Project alignment, are either plugged or idle, with the nearest active well situated approximately 1.5 miles west of the proposed Project alignment. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by

commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-84 3.15-20/6

The plan would also address the unlikely scenario where the system cannot be moved to unload passengers normally at stations. The robust design, periodic and preventative maintenance, and equipment redundancies are intended to minimize these potential impacts. However, the plan would include procedures to evacuate passengers directly from cabins, if needed. An Evacuation Plan would be developed as part of the Project-specific Emergency Operations Plan, as required by industry standards and State regulations….would describe the preferred methods….would also include the required equipment and procedures for evacuation, site control, and passenger communications….would be performed in advance of opening the system….would document the procedures, equipment, and personnel necessary to evacuate the system,….. Such analysis, practice, and documentation is required by OSHA.

Provide a draft Project description demonstrating a robust design vs typical design for the Project. Provide a draft maintenance manual for the Project, along with a clear assessment of equipment redundancy and service cycling of such.

Provide a draft evacuation plan for in-station and on-line gondolas and related equipment for such operations.

Provide draft comparisons of industry standards and preferred measures for this Project and relate such to potential impacts or mitigations.

Provide a listing and citations for related references of industry standards and regulations related to the above.

Provide a draft for all OSHA related analysis, practices, and documentation for such a Project, and provide references for such for at least three similar elevated projects in the US.

Provide a completely revised Supplemental DEIR with the above requests along with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-84 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical

Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's safety features, maintenance, evacuation plans, and applicable industry standards. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-85 3.16-31/3 3.17.1 Regulatory Setting Federal Americans with Disabilities (ADA) Act of 1990 Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101….establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. The Project will be designed to meet all ADA design requirements.

Provide a thorough and complete review and draft illustrations/drawings for all ADA design sites within Project and related equipment, especially for wheelchair and walker/stroller devices.

Provide

Provide a completely revised Supplemental DEIR with adequate descriptions, assessments, and mitigation for ADA compliance along with alternative projects and their numerical/quantitative comparisons and selection.

Response GO18-85 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would comply with the accessibility requirements of the ADA. The station boarding process and cabins would comply with all accessibility requirements of the ADA. If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized

passageways. The entry widths and interior size of each cabin would comply with the requirements of the ADA. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-86 4-1/1 4.0 ALTERNATIVES 4.1 INTRODUCTION Alternatives have been considered in this Draft EIR to explore potential means to mitigate or avoid the significant environmental impacts associated with implementation of the proposed Project, while still achieving the primary objectives of the proposed Project….an EIR shall describe the range of reasonable alternatives, which may include alternatives to the location of the project, which would feasibly attain most of the basic objectives of the project….EIR…does not need to consider every conceivable alternative or consider alternatives that are infeasible, but rather only alternatives necessary to permit a reasoned choice….No Project Alternative…to determine the consequences of not implementing the project…., and comparison of alternatives, the relative advantages and disadvantages of each alternative can be determined.

Provide goals/purposes of the Project and their related dependent objectives and policies/program.

Provide definitions of reasonable, feasibly, infeasible, and reasoned-choice and provide examples of such within the Project description and alternatives.

As required by CEQA, provide a numerical/quantified comparison of all environmental sectors and for all alternatives.

Provide a completely revised Supplemental DEIR in accordance with above deficiencies with adequate descriptions, assessments, and mitigation for alternative projects along with numerical/quantitative comparisons and selection.

Response GO18-86 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, for a discussion of the purpose and need for the proposed Project, and the Project Objectives. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Section 4.0, Alternatives, also discusses alternatives considered

but dismissed from detailed analysis during the scoping process due to infeasibility, as required by CEQA Guidelines section 15126(c). CEQA Guidelines section 15126(f)(1) provides that the factors taken into account to address the feasibility of alternatives include "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." Section 4.0's assessment of impact areas for each alternative studied is in compliance with CEQA and the Guidelines, and to the extent this comment requests further numerical or quantified details for each alternative, this is not what CEQA requires. (See CEQA Guidelines, § 15126.) Table 4-1, Alternatives Conformance with Objectives, and Table 4-3, Alternative Impact Comparison, of the Draft EIR, provide a comparison of the proposed Project and the Project Alternatives impacts, and the Project Alternatives' ability to meet the Project Objectives. Refer to Topical Response H: The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for further discussion of the CEQA requirements for an Alternatives analysis, the basis and range of alternatives evaluated in the Draft EIR, and the purpose and basis for the stated project objectives. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-87 Apdx K 1979/ & 1980/ During the late nineteenth and early twentieth centuries, crude oil was extracted from multiple small oilfields nearby and processed at the former Southern Refining Company located immediately northwest of the Site. Historical aerial photos and Sanborn maps indicate that the refinery contained four aboveground storage tanks (ASTs) for storing crude oil. The refinery was apparently dismantled by 1921 and the ASTs were removed sometime between 1921 and 1928. The Site has been used as a railroad junction for over 100 years and is currently maintained as such for use by three major passenger and freight lines.

Revise mis-directions of historic uses (SE rather than NW) and provide historic aerial photos of such site.

Provide address of site: e.g., 1300 CARDINAL STREET 1700 ft SE-E of Alameda for Southern Refining Company and Amalgamated Oil Company, now Williams Mead Housing Project.

Provide historic aerial photos and maps and revised Apdx K.

The entire DEIR and appendices do not consider or provide information provided in ZIMAS, LA City Dept. City Planning online database Very limited references in DEIR with singular mentions in the DEIR and geotechnical report, only. Withdraw current

DEIR, revise, and update and recirculate as supplemental/subsequent DEIR with incorporated ZIMAS information for all pertinent descriptions.

Response GO18-87 This comment provides a general recitation and characterization of text from the Draft EIR. The directions described on page 1979 of Appendix K, Phase I Environmental Site Assessment, to the Draft EIR, was provided in the EDR Environmental Database Report. Site addresses are provided as part of the EDR Radius Map, beginning on page 652 in Appendix K, Phase I Environmental Site Assessment, to the Draft EIR. Historic aerial photographs are provided beginning on page 342 in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project or from a new mitigation measure proposed to be implemented.

Comment GO18-88 Sept. 2022 Los Angeles Aerial Rapid Transit 16037.000.000 Geotechnical Document in Support of the Environmental Impact Report

APPENDIX I

Apdx. I-1 GeoTechnical Report ENGEO Project No. 16037.000.000

We are pleased to submit this document characterizing the general geologic/geotechnical conditions of the Los Angeles Aerial Rapid Transit (LA ART) project in Los Angeles, California. This report is a compilation of adjacent publicly available previous geotechnical assessments and explorations to assist in preparation of the Draft Environmental Impact Report (EIR).

Provide references (doc and page/paragraphs) for mentioned assessments and explorations. Provide geotechnical documentation for RTD/MTA Red Line Union Station and US-Civic Center rail Tunnels beneath this Project and adjacent to the Project's Alameda Station.

Provide review and pertinent information from geotechnical documents related to the Buena Vista Project along south side of Broadway and under and adjacent to the Broadway/Bishop Tower.

Provide commonly used industry standards references (docs, pages, and paragraphs) and compiled regulations, laws, and standards requirements for geotechnical settings and impacts as a mandatory compliance mitigation measure.

Provide contractual requirements for all construction contracts and differentiate between geotechnical requirements and mitigations.

Provide revised supplemental/subsequent DEIR for public review and comments.

Response GO18-88 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to page 31 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for references to documents used in preparation of Appendix I. Refer to Section 3.7.1, Regulatory Setting, of the Draft EIR, for discussion of laws and regulations applicable to geology, soils, and seismic conditions in the proposed Project study area. Refer to Section 3.7.5, Mitigation Measures, of the Draft EIR, for discussion of Mitigation Measure GEO-A. Mitigation Measure GEO-A would require the Project Sponsor to engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-89 Apdx. I - 2/1 This document was prepared based on a desktop study of readily available publicly accessible geotechnical reports and data. Geotechnical explorations and laboratory testing were not a part of this initial preliminary study scope.

No project borings, No records of vicinity geotechnical borings, Including Red Line Phase 1, Alameda – Tunnel and UStn, Buena Vista, Cornfields/Historic park, and William Mead Project.

The DEIR is totally deficient and inadequate regarding to geotechnical (and other EIR elements') settings, impacts assessments, and mitigations. Provide at least 4 borings per Project element to establish geological conditions and potential impacts of the Project on the area resources, and their hazards upon the Project.

Provide review of all recorded seismic events within 5000ft of the Project area limits and potential sources (including SCEC, Pasadena).

Response GO18-89 Refer to Section 3.07, Geology and Soils, of the Draft EIR, with supporting data in Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Refer to Response GO18-43 for a discussion of why excavation for geotechnical borings is impracticable at this juncture.

Comment GO18-90 Apdx. I-13/1 approximately 10 miles within the earth (Wallace, 1990). The predominant fault system affecting the Project area is the Transverse Ranges fault system, which trends east-west and relieves strain primarily through reverse-slip, and left-lateral, strike-slip displacement.

Provide review of all recorded seismic events within 5000ft of the Project area limits, potential sources (including SCEC, Pasadena).

Provide review of the Elysian Park North Fault (see ZIMAS and others) underlying the Project sites and others north of Broadway.

Response GO18-90 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, of the Draft EIR, with supporting data in Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Section 3.7.2.5, Regional Seismic Hazards, in the Draft EIR, and Section 4.2.1.1 in Appendix I, Geotechnical Document in Support of the Environmental Impact Report,

to the Draft EIR, for discussion on the Elysian Park Fault. The proposed Project area is in a seismically active region in southern California, but the proposed Project alignment is not in a State of California Earthquake Fault Zone (Alquist-Priolo Earthquake Fault Zone) for known Holocene active faults capable of fault surface rupture. The Elysian Park fault does traverse the proposed Project area, but it is a blind thrust fault and is not capable of surface fault rupture. Therefore, the risk of surface rupture due to faulting is considered low and construction of the proposed Project would not directly or indirectly cause potential substantial adverse effects. Refer to Response GO18-3 for discussion on the ZIMAS tool. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment GO18-91 Apdx. I-13/2 4.1.2 Site Topography The majority (3/4) of the proposed Project alignment occupies a gentle, south-sloping alluvial plain located approximately ½ mile west of the Los Angeles River (Figures 1 and 2).

Provide measurements in feet: 4057/6260 ft (65%) of length and 2880-3500ft west of LA River low flow channel rather than two different units (% and miles)in same sentence.

Response GO18-91 This comment provides a general recitation and characterization of text from the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment GO18-92 Apdx. I -13/5 [Qyf 1 Holocene-Pleistocene] This geologic unit was deposited primarily from flood deposits and debris flows.

As used, Qyf includes the entire Quaternary (Holocene and Pleistocene). Provide specific technical term usage, Holocene is an interval of the Quaternary, not Pleistocene.

Response GO18-92 This comment provides a general recitation and characterization of text from the Draft EIR. As stated on page 13 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, "West of North Broadway, the

alignment is underlain by Holocene to Pleistocene alluvial fan deposits (Qyf1) fed by southeast-trending drainages including Chavez Ravine emanating from the highlands of the Elysian Park area." Appendix I states "Holocene *to* Pleistocene," not "Holocene and Pleistocene," as noted in the comment.

Comment GO18-93 Apdx. I-13/6 4.1.3.3 Flood and Stream Channel Deposits According to geologic mapping by Campbell (2014), the alignment from the southern end to where it crosses North Broadway is underlain by late Pleistocene alluvium (Figure 3 - Qya2).

Provide accessible, specific sources (page/paragraph) for reference or provide copy of map in Appendix.

Provide differentiation between Late Pleistocene (Qo) and Holocene (Qy), as this designation would indicate all surface deposits would have potential for important fossils.

Response GO18-93 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to page 31 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for reference to the Preliminary Geologic Map of the Los Angeles 30'x 60' Quadrangle, California, produced by the California Geological Survey. Refer also to Figure 3.7-1 in Section 3.7.2.2, Local Geology, of the Draft EIR, and Figure 3 in Appendix I, for a depiction of a subset of the referenced map focused on the proposed Project area which includes areas of Late Pleistocene and Holocene deposits. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-94 Apdx. I -14/2 The geologic structure in the area of the site is characterized by the northeast-southwest-trending Elysian Park Anticline and the underlying Elysian Park Blind Thrust fault. The Project site is located over the southwest limb of the anticline. Bedding in the Puente Formation in the area generally dips from 25 to 50 degrees towards the southwest.

Other geotechnical sources (ZIMAS, et al) indicate that the EPBT Fault is aligned NW-SE rather than NE-SW beneath the Project.

Similarly general anticline axis orientation of NE-SW would require the flanks to dip from the axis to the NW and SE, rather than the SW; anticline axis (top of fold) maybe to SW.

Provide review and revisions by qualified geologist for review of relevant appendices and DEIR text for a Supplement DEIR.

Response GO18-94 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. As noted on page 3 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, the report was prepared by a certified geologist. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id.*, § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-95 Apdx. I -16/ TABLE 4.2.1.1-1: Nearby Active Faults (USGS 2008) Lat.=34.065019; Long.=-118.235495 FAULT NAME Elysian Park (Upper)*

Provide a single consistent name/term for the fault.

Response GO18-95 This comment provides a general recitation and characterization of text from the Draft EIR. The nomenclature employed in Table 4.2.1.1-1: Nearby Active Faults (USGS 2008) Latitude = 34.065019; Longitude = - 118.235495, is derived from the U.S. Geological Survey fault database.

Comment GO18-96 Apdx. I -17/2 Elysian Park Fault (Blind Thrust Fault) The fault closest to the Project site is the Elysian Park fault. According to the USGS Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment.

The Upper Elysian Park fault is a north-to-northeast-dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. ZIMAS

However, the Upper Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture and; therefore, is not subject to the conditions of the Alquist-Priolo Act. ZIMAS

It is thought to be seismogenic (capable of generating earthquakes) from a depth….

Because there is no surface expression of the Elysian Park fault, constraints on the long-term slip rates on the fault…, rather than from paleoseismic data.

Although these constraints are limiting, the most current models (UCERF3) indicate… it has approximately 1.2% probability of participating in an earthquake of magnitude greater than 6.7 before 2038….The likelihood of experiencing an event of Magnitude > 7.0 is 0.8%, and the likelihood of experiencing an event of Magnitude > 7.5 is less than 0.1% in that time period.

Provide references for all such statements along with page/paragraph so that discussion of faults can be verified as accurate.

As ZIMAS shows the Project to cross and extend through the fault zone, this discussion needs to be thoroughly and adequately displayed and rectified as it is wrong, based on LACity ZIMAS.

Provide specifics assessments/mitigation regarding fault/design inclusions for Park Station, Broadway and Elysian towers, and Stadium Station and supports within the ZIMAS designated surface fault zone.

Provide accessible reference for UCERF3 as applied to this fault and location.

Provide seismic assessment of structural responses for towers, stations, cables, and gondolas during a 6.4-6.7 magnitude on the Elysian Park Fault.

Provide description and assessments reflecting the LACity-DCP ZIMAS info-base.

Response GO18-96 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of this Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including seismic shaking, upon implementation of Mitigation Measure GEO-A. The proposed Project area is in a seismically active region in southern California, but the proposed Project alignment is not in a State of California Earthquake Fault Zone (Alquist-Priolo Earthquake Fault Zone) for known Holocene active faults capable of fault surface rupture. The Elysian Park fault does traverse the proposed Project area, but it is a blind thrust fault and is not capable of surface fault rupture. Refer to page 31 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for references to documents used in preparation of Appendix I. As indicated beginning on page 3.7-8, citations 11 through 18 provide data and mapping related to surface zones, liquefaction, and landslides. Refer to Response GO18-3 regarding ZIMAS. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-97 Apdx. I -17/4 These portions of the Project alignment are located in an area mapped as potentially subject to liquefaction on the Safety Element Exhibit B of City of Los Angeles General Plan and the State of California Seismic Hazards Zones map as shown on Figure 5. The Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State

Park Station, and Broadway Junction are located in an area mapped as potentially subject to liquefaction.

Provide appropriate ZIMAS references. No specific references to ZIMAS.

Response GO18-97 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS.

Comment GO18-98 Apdx. I -18/4 The proposed Project alignment is located in an area classified as MRZ-3 as shown on Figure 6. MRZ-3….” The proposed Project alignment is also located just beyond the eastern end of, but not within, what is designated as the Los Angeles City Oil Field.

Although not within the surface delineation of the LA Oil Field, close enough that may reflect the underlying oil/gas occurrences and production zones.

CalGEM Wellfinder shows the route alignment within the mapped oil field. North of Bruno/Alameda intersection, the Project Park Station lies within the well field along with 1200+ft of the cableway, and the Broadway Junction lies 550 ft east of the mapped field.

As many parcels through which the Project alignment passes are designated as “Methane Zones” they would be within the land above the designated Los Angeles Oil Field.

No references given. Provide appropriate ZIMAS references and DOC CalGEM WellFinder site.

Response GO18-98 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. As discussed on page 6-18 of Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, the California Department of Conservation’s online Geologic Energy Management Division (CalGEM) was accessed to identify potential methane releases within the proposed Project area. As noted on page 19 of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, the proposed Project is located just beyond the eastern end, but not within, what is designated as the Los Angeles City Oil Field. The proximity to the proposed Project is noted in Figure 7, Regional Oil Wells and Methane Zones, which also shows the location of some proposed Project elements within Methane and/or Methane Buffer Zones. As stated on page 3.9-19, Figure 3.9-1, Methane Zones Within the Project Area, is a City of Los Angeles Department of Building and Safety map, which lists and categorizes Methane Zones and Methane Buffer Zones. As stated on page 42 of Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, the information was referenced on March 31, 2022, from the City of Los Angeles (2004). Refer to Response GO18-3

regarding ZIMAS. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-99 Apdx. I -19/1 …located in a City-designated hillside area, indicating the sites may have an increased susceptibility to landslides.\3 \3 City of Los Angeles. Zone Information and Map Access (ZIMAS). Available at: http://zimas.lacity.org/. Accessed May 2022

Only reference to ZIMAS in the entire DEIR although landslides are indicated by ZIMAS for parcels NW of SR-110 and for the Alpine Tower and Stadium Station areas.

Provide review of all Project element locations with regard to ZIMAS database information, e.g., faults, landslide, and liquefactions.

Provide review of liquefaction potential as indicated by ZIMAS for Project area and facilities south of Broadway. Provide appropriate mitigation for liquefaction and for landslides especially when seismically induced

Response GO18-99 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A. As discussed in Section 3.7.5, Mitigation Measures, of the Draft EIR, Mitigation Measure GEO-A provides for preparation of Site-Specific Final Geotechnical Report that will include recommended measures to reduce potential impacts related to liquefaction induced by the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-100 Apdx. I -20/1 …which require monitoring before and during construction. Although long-term methane controls are not required, preliminary construction planning should adhere to Section 91.7101 of the Los Angeles Municipal Code, which

controls for methane intrusion emanating from geologic formations. The need for methane controls may be reduced or eliminated by conducting site-specific methane testing for elements constructed within the methane zones and buffer zones to evaluate the potential hazard, pursuant to Section 91.7104.1.

ZIMAS clearly indicates parcels which are designated as being in a Methane Zone or Methane Buffer Zone, is not so designated in the DEIR setting and no mitigation measures are proposed.

As no methane surveys, testing, and monitoring has been conducted within the Project sites, the needs for methane monitoring and controls must be implemented before and throughout construction, especially for towers, the junction, and Park Station.

The appendix does not clearly describe the Project sites but states that monitoring will be conducted before construction and hopefully would be assessed before construction contracts are offered. Without any direct information or assessment, the DEIR assesses that construction and longer term methane controls will not be needed, even though the Park Station and Broadway Tower lie within designated Methane Zones.

Provide a thorough description of methane gas conditions of surface and subsurface based on >10ft borings for each Project site and as required by Metro for construction of major surface and subsurface facilities. Provide suitable mitigation and safety plans for those sites with methane gases in soils and groundwater.

Provide specific contractor programs to monitor, to control, and to assess measures required for continuing safe operations at all Project facilities located in ZIMAS recognized Methane Zones.

Response GO18-100 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, with supporting data provided in Appendix K, Phase I Environmental Site Assessment, for discussion of the proposed Project relative to the Methane and Methane Buffer Zones and how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. As discussed, beginning on page 3.9-25, in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, during construction, ground-moving activities such as excavation for the foundations of the stations and towers would include disturbance of soils and pass through Methane Zones and/or Methane Buffer Zones. Methane exposure to workers during construction can be hazardous at high levels, but it is anticipated that construction methods for the proposed Project would involve relatively shallow and wide excavations and would not be considered confined spaces, which therefore reduces the likelihood of construction workers being exposed to gas concentration that would be hazardous due to inhalation. Further,

construction activities and workers would be required to comply with OSHA and Cal/OSHA regulations. As discussed on page 3.9-27 in Section 3.09 of the Draft EIR, although the stations, junction, and towers are open-aired structures, enclosed vertical circulation elements (stairwells and/or elevators) would be required to be designed and constructed to comply with Division 71 of the LAMC and Cal/OSHA regulations to ensure worker health and safety. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-101 Apdx. I -21/1 5.2.2 Seismic Hazards Mapping Act of 1990…addresses earthquake hazards other than surface fault rupture, including liquefaction and seismically induced landslides.…identifying and mapping seismic hazard zones and mitigating seismic hazards to protect public health and safety.

Provide specific page/paragraph citations and include specific parcel references for ZIMAS assignments to surface zones, liquefaction, and landslides.

Provide a thoroughly revised and supplemented Subsequent Draft Environmental Report (SDEIR) for public review and comments.

Response GO18-101 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction, with implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-102 Apdx. I -21/1 It requires the California Department of Conservation, Division of Mines and Geology, to map seismic hazards and establishes specific criteria for project approval that apply within seismic hazard zones, including the requirement for a geological technical report. The California Department of Conservation has mapped seismic hazards or established specific criteria for the area that includes the Project site (CGS, 1998).

Provide specific page/paragraph citations and include specific parcel references for ZIMAS assignments to surface zones, liquefaction, and landslides.

Provide parcel specific seismic hazard zones for all Project construction sites.

Response GO18-102 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for data and mapping related to surface zones, liquefaction, and landslides and for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including liquefaction, with implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-103 Apdx. I -21/2 The geological reports prepared for the Project satisfy the requirements of the Seismic Hazards Mapping Act at the preliminary project level. Additional site-specific studies designed to explore the subsurface conditions in areas of planned development will be completed prior to submittal of final plans.

Define "preliminary project level" and provide schedule/contents for final plans (and designs) and current/2023 industry standards for designs and project description used for basis of CEQA/EIR compliance and agency certification of this Project.

Provide list, outlines, and completion schedules for all site specific studies. Provide requirements for all such future studies to be incorporated into a subsequent DEIR.

Provide above and a total revision of DEIR, and especially geotechnical considerations, and resubmit as a supplemental/subsequent DEIR for public review and comments.

Response GO18-103 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or

prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in the proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-104 Apdx. I -22/5 5.2.2 Seismic Hazards Mapping Act of 1990 The California State Seismic Hazards Mapping Act of 1990 addresses earthquake hazards other than surface fault rupture, including liquefaction and seismically induced landslides….The geological reports prepared for the Project satisfy the requirements of the Seismic Hazards Mapping Act at the preliminary project level. Additional site-specific studies designed to explore the subsurface conditions in areas of planned development will be completed prior to submittal of final plans.

Define "preliminary project level" and provide schedule/contents for final plans (and designs) along with citations + page/paragraph of any references and provide current/2023 industry standards for designs and project description used for basis of CEQA/EIR compliance and agency certification of this Project.

Provide list, outlines, and completion schedules for all site specific studies.

Provide the above and total revision of DEIR, and especially geotechnical considerations, and resubmit as a supplemental/subsequent DEIR for public review and comments.

Response GO18-104 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail

beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-105 Apdx. I -22/6 Division 71 (Methane Seepage Regulations) describes methane testing and mitigation requirements based on building type, building use/occupation, and whether a structure is located within a methane zone or buffer zone. The proposed Project alignment crosses a methane zone and buffer zone and may require site-specific methane testing for particular structures, depending on the final architectural design.

Provide and implement a methane monitoring and assessment program for all construction sites prior to preparation of a supplemental/subsequent DEIR for public review and comments.

Provide all of the above and total revision of DEIR, and especially geotechnical considerations, and resubmit as a supplemental/subsequent DEIR for public review and comments.

Response GO18-105 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR with supporting data provided in Appendix K, Phase I Environmental Site Assessment, for discussion of the proposed Project relative to the Methane and Methane Buffer Zones and how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental

impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-106 Apdx. I -24/1 Impact: There is potential for the proposed Project to expose people or structures to seismic hazards listed above. Mitigation measures would be required to reduce impacts to a less than significant level.

Provide review and assessment of all fault and seismic impacts given for an event equal to 6.4 magnitude as noted in ZIMAS. Provide for pre-construction and ongoing microseismic monitoring for the Upper Elysian Park Fault zone beneath the Project.

Replace all "would's" with shall's or must's.

Provide for additional mitigation programs for at least 120 minute emergency evacuation programs and for damage prevention for surrounding land uses in the event of tower ccollapses or toppling.

Provide all of the above and total revision of DEIR, and especially geotechnical considerations, and resubmit as a supplemental/subsequent DEIR for public review and comments.

Response GO18-106 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils upon implementation of Mitigation Measures GEO-A. The proposed Project area is in a seismically active region in southern California, but the proposed Project alignment is not in a State of California Earthquake Fault Zone (Alquist-Priolo Earthquake Fault Zone) for known Holocene active faults capable of fault surface rupture. The Elysian Park fault does traverse the proposed Project area, but it is a blind thrust fault and is not capable of surface fault rupture. Refer to Response GO18-3 regarding ZIMAS. Refer to Topical Response J, Gondola Design and Operations, for discussion of how an Evacuation Plan would be developed as part of the Emergency Operations Plan of the proposed Project. CEQA does not require

extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-107 Apdx. I -24/2 To mitigate the shaking effects, structures should be designed using sound engineering judgment and the current CBC requirements, as a minimum.

Provide definitions and comparisons for should's and would's vs shall's and will's. Replace all "should's" with shall's or must's.

Provide all of the above and total revision of DEIR, and especially geotechnical considerations, and resubmit as a supplemental/subsequent DEIR for public review and comments.

Response GO18-107 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Response GO18-106. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-108 Apdx. I -24/2 However, the proposed Project alignment is not located within a State of California Earthquake Fault Zone for known Holocene-active faults capable of fault surface rupture (CGS, 2017) or located within an Alquist-Priolo Earthquake Fault Zone. Accordingly, the risk of surface rupture due to faulting is considered low. As such, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be considered less than significant.

Replace all "would's" with shall's or must's.

No reference to ZIMAS nor to Buena Vista Scoping and related studies. No references to competent certified reviewers for such statements and use of conditionals.

Provide an adequate and complete technical review and statement of significance by competent certified engineer. All such additions must be provided in a subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments.

Response GO18-108 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Response GO18-3 regarding ZIMAS. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to seismic-related ground failures upon implementation of Mitigation Measure GEO-A. As indicated beginning on page 3.7-8, of Section 3.07, Geology and Soils, citations 11 through 18 provide data and mapping related to surface zones, liquefaction, and landslides. Moreover, CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-109 Apdx. I -24/4 The actual risk of the liquefaction hazard and related damages should be evaluated in the site-specific geotechnical report. The Project would be required to comply with all standards, requirements, and conditions contained in construction-related codes (e.g.,…), which would ensure structural integrity and safe construction.

Actual risks and mitigation measures must be evaluated in a sites-specific review and assessment by a competent, certified engineer(s), must be based on adequate and complete geotechnical studies and assessments, and must provide appropriate mitigation and compensation measures to warrant a less-than-significant risks to structures and passengers.

Provide an adequate and complete technical review and statement of significance by competent certified engineer. All such additions must be provided in a subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments.

Response GO18-109 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, with supporting data in Appendix I, Geotechnical Document in Support of the Environmental Impact Report, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation

Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-110 Apdx. I -25/1 Therefore, impacts related to earthquake-induced slope failure could be considered moderately significant to significant and should be addressed per Mitigation Measure GEO-A.

Use of could/should and ranges of significance are inconsistent with CEQA and must be based on factual evidence for the Project sites and assessments by competent, certified reviewers.

Provide an adequate and complete technical review and statement of significance by competent certified engineer. All such additions must be provided in a subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments.

Response GO18-110 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of this Final EIR, for discussion of the structural design of the proposed Project and how the proposed Project would have less than significant impacts related to geology and soils, including seismic shaking, upon implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.) The

CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-111 Apdx. I -25/2 Compliance with existing laws and regulations, and implementation of Mitigation Measure GEO-A, requiring the development and implementation of geotechnical recommendations to be incorporated into the design plans and specifications, would reduce impacts to less than significant.

As indicated in text, the current DEIR finds current designs would generate significant impacts for seismicity/Geological Resources, as the referenced programs have not been conducted and the public has not had a public review and comments for the mitigation measures to be considered.

Response GO18-111 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of this Final EIR, for discussion of the structural design of the proposed Project and how the proposed Project would have less than significant impacts related to geology and soils, including seismic shaking, upon implementation of Mitigation Measure GEO-A. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact.

Comment GO18-112 Apdx. I -25/3 Operation Upon completion of the construction activities, the proposed Project would have complied with…, as well as Mitigation Measure GEO-A. Operation of the aerial gondola system would have a less than significant impact with respect to exposing people or structures to seismic hazards if appropriate mitigation measures are applied during construction.

As indicated, appropriate mitigation measures (which are unknown in this DEIR and not based on evidence) are not available for public review and comment.

As indicated in this text, the current DEIR finds current designs would generate significant impacts for seismicity/Geological Resources, as the referenced programs have not been conducted and the public has not had a public review and comments for the mitigation measures to be considered.

Provide an adequate and complete technical review and statement of significance by competent certified engineer prior to further considerations of this DEIR.

Provide such additions in an adequate and complete subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments.

Response GO18-112 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of this Final EIR, for discussion of the structural design of the proposed Project and how the proposed Project would have less than significant impacts related to geology and soils, including seismic shaking, upon implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id.*, § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-113 Apdx. I -29/8 8. CONCLUSION The proposed Project would have less than significant impacts with respect to geologic and geotechnical hazards with application of the recommended mitigation measures. Prior to grading and construction permits being issued, a site-specific final geotechnical report should be prepared, as recommended in Mitigation Measure GEO-A. …should include site-specific measures and design considerations for the stations, junction, and towers. The recommendations may vary depending on the geologic and geotechnical conditions at each location.

Replace ALL would's + should's with shall or musts and provide specific and contractual required (must) mitigation along with numerical evaluation of assessed impacts before and after required mitigation.

Provide such additions in an adequate and complete subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments

Response GO18-113 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Topical Response I, Use of Plans in Mitigation Measures and Project Design Features, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of this Final EIR, for discussion of the structural design of the proposed Project and how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-114 Apdx J Greenhouse Gas Emissions Technical Report 20/4 2.2.2.5 Senate Bill 44 Senate Bill (SB) 44, signed October 7, 2021, provides specialized procedures for the administrative and judicial review of processes and approvals for an "environmental leadership transit project." SB 44 defines an "environmental leadership transit project" as "a project to construct a fixed guideway and related fixed facilities" that meets all of the following conditions:

A. The fixed guideway operates at zero-emissions.

B. (i) If the project is more than two miles in length,…

(ii) If the project is no more than two miles in length, the project reduces emissions by no less than 50,000 metric tons of greenhouse gases directly in the corridor of the project defined in the applicable environmental document over the useful life of the project, without using offsets.

C. The project reduces no less than 30,000,000 vehicle miles traveled in the corridor of the project defined in the applicable environmental document over the useful life of the project.

Provide a specific table of SB44 requirements and Project achievements in quantitative form consistent with the specific requirements of SB44, including for events only and for non-event calendar only.

Provide a useful life period for events-based and full-time base for Project operations.

Provide such additions in an adequate and complete subsequent/supplemental DEIR prior to further consideration of the Project and public review and comments.

Response GO18-114 This comment provides a general recitation and characterization of Senate Bill 44. Refer to Section 1.0, Introduction, Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, and Section 3.17, Transportation, of the Draft EIR, for discussion and quantitative analysis demonstrating how the proposed Project is consistent with the requirements of SB 44. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. Refer to Appendix R, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Draft EIR, and Appendix E, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Final EIR. Refer to Topical Response A, SB 44, for discussion of how the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gas emissions directly in the proposed Project's corridor as defined within the EIR over the useful life of the proposed Project, and without using offsets the proposed Project's lifetime VMT reduction over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under SB 44. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-115 Apdx L-58/1 7. Conclusion Construction and operation of the proposed Project could result in adverse effects to surface water and groundwater quality in the Los Angeles River and Central Basin, and violate water quality standards and waste discharge requirements, if not appropriately managed. However, adherence to applicable federal, State, regional, and local laws and regulations would result in less than significant impacts.

Provide Project-specific definitions, procedures, and designs of "appropriate" management and adherence. Provide hydrologic model and numerical results based on specific design and operational conditions for each Project construction site.

Response GO18-115 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, in the Draft EIR, with supporting data provided in Appendix L, Hydrology and Water Quality Technical Study, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. As discussed on page 3.10-29, in Section 3.10, Hydrology and Water Quality, Table 3.10-3: Existing and New Impervious Surface Area, indicates numerical results of the changes in impervious surface area affecting surface water quality. The proposed Project would be designed to incorporate several sustainability features for the proposed Project's post-

construction design to control/treat runoff. The proposed Project would incorporate best management practices (BMPs) to ensure the treatment of the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The proposed Project and low impact development (LID) Plan incorporating BMP design features would comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, as well as commonly used industry standards. Refer to Response GO18-76 for discussion of laws and regulations applicable to hydrology and water quality. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-116 Apdx L-58/2 Additionally, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge….Although the proposed Project would result in increases to impervious surfaces, the additional impervious surface areas are nominal, and all proposed Project components would comply with the LID ordinance as applicable, thereby reducing runoff. Impacts would be less than significant.

No numerical description and assessment are provided for current and Project conditions and no definitions of "substantially" or "nominal" are provided. Provide numerical analyses for each project construction site and provide specific LID measures and their mitigative effects to bypass rainfall into groundwater for each site, none are provided here and elsewhere.

Provide designs and flowcharts for all LID related designs for collection, conveyance, storage, and recharging for each Project site.

Response GO18-116 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, with supporting data provided in Appendix L of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Response GO18-115 for a discussion of the proposed Project's hydrology and water quality impacts. Each drainage area on the proposed Project site would include design elements that serve to capture and re-use stormwater in accordance with current LID requirements—thereby minimizing the potential for both on- and off-site erosion, siltation, and flooding while simultaneously providing irrigation supply and reducing potable water consumptive use. LID design features slow (detain or retain) stormwater that reduces the runoff volume discharged from the proposed Project and decreases the peak runoff discharge velocity for design storms—also ultimately

reducing the amount of stormwater runoff burden into the City's stormwater conveyance systems. As a result, less flow with fewer pollutants would be transported through the conveyance systems and ultimately into surface waters, including ancillary exfiltration to the groundwater table. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment GO18-117 Apdx L-58/4 The proposed Project could potentially conflict with or obstruct implementation of water quality control or sustainable groundwater management plans. Although construction and operation of the proposed Project would potentially impact the water quality of the Los Angeles River and Central Basin…, adherence to applicable federal, State, regional, and local laws and regulations would ensure the proposed Project would comply with all federal, State, and local water quality control or sustainable groundwater management plans. Impacts would be less than significant.

No numerical description and assessment are provided for current and Project conditions and no definitions of "substantially" or "nominal" are provided. Provide numerical analyses for each project construction site and provide specific LID measures and their mitigative effects to bypass rainfall into groundwater for each site, none are provided here and elsewhere.

Reference to adherence to laws and regulations is totally unacceptable and must be replaced with a design-operations based mitigation manual with assigned actions/procedure and equipment for all contractors, and associated approved permits from regulatory agencies.

Provide designs and flowcharts for all LID related designs for collection, conveyance, storage, and recharging for each Project site.

Provide a revised, supplemental/subsequent DEIR for all hydrologic elements.

Response GO18-117 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Responses GO18-115 and GO18-116 for a discussion of the proposed Project's hydrology and water quality impacts. Refer to Section 3.10, Hydrology and Water Quality, with supporting data provided in Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA.

Refer to Response GO18-76 for discussion of laws and regulations applicable to hydrology and water quality. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-118 Apdx L-58/5 The proposed Project could have potential adverse impacts related to hydrology and water quality; however, with adherence to applicable…, significant impacts would be less than significant level. The proposed Project would not result in any significant impacts related to hydrology and water quality.

No numerical description and assessment are provided for current and Project conditions and no definitions of "substantially" or "nominal" are provided. Provide numerical analyses for each project construction site and provide specific LID measures and their mitigative effects to bypass rainfall into groundwater for each site, none are provided here and elsewhere.

Provide designs and flowcharts for all LID related designs for collection, conveyance, storage, and recharging for each Project site.

Provide a revised, supplemental/subsequent DEIR for all hydrologic elements.

Response GO18-118 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.10, Hydrology and Water Quality, with supporting data provided in Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hydrology and water quality. Refer to Responses GO18-115 through GO18-117 for a discussion of the proposed Project's hydrology and water quality impacts.

Comment GO18-119 Apdx.F Archaeological and Paleontological Resources Assessment

No mentions are made in DEIR regarding significant historic/archaeological remains recovered from excavations conducted at the Union Station area (for mitigation of suspected impacts from Union Station and subway construction for Red Line Phase 1.

Archaeology – SW Park Station and Alameda/Chavez location (China town 2, 1900-1925) and American Indian – (1800-1900)

Bishop Str. Historic uses of Italian (1890-1925) and Chinese (Post 1920) origins – Chinatown 2

Provide four borehole drilling/analyses to depths of 10ft and assessment for potential historic archaeological remains at each Project construction sites, and especially those from Alameda – Broadway sites. Provide at least two boreholes for sites north of Broadway.

Apdx F-70/2 The results of the records search, shown in Table 7, indicated that there are no known NHM vertebrate fossil localities within the Area of Direct Impacts. Moreover, the majority of the Area of Direct Impacts, consisting of surficial deposits of younger Quaternary alluvium, is not anticipated to contain significant fossil remains in its uppermost layers because the sediment is too young to contain such fossils.

Provide the specific technical basis for such identification of "younger", "uppermost" (?= 0.1ft or 10ft) and their distribution. Provide 4 or more borings of 10 ft for each site south of SR-110. Provide thorough and adequate analyses and assessments of potential fossils and remains to document age and resources.

Apdx F-94/2 Quaternary alluvium is expected to be present at differential depths within the Project Area. Planned Project excavation is anticipated to reach up to 10 feet, except at Dodger Stadium Station where the maximum depth would be 42 feet, and piles would be drilled to a max depth of 125 feet; therefore, Project construction may encounter paleontological deposits.

Replace "differential" with different and "up to" with down to.

Provide four borehole drilling/analyses to depths of 10ft and assessment for potential historic archaeological remains at each Project construction sites, and especially those from Alameda –Broadway sites. Provide at least two boreholes for sites north of Broadway.

Provide a thorough construction mitigation program for archaeological and paleontological remains with specific contractual requirements for assessment, encountering, and recovery of all paleontological and archaeological remains. Include in a thoroughly and adequately revised DEIR for public review and additional comments.

Response GO18-119 This comment provides a general recitation and characterization of text from the Draft EIR. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related

to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would implement Mitigation Measure GEO-B, requiring the preparation of a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Refer to Response GO18-43 for a discussion of why boring sampling for paleontological resources is impracticable at this juncture. Boring sampling for archaeological resources is impracticable for similar reasons. As discussed in Topical Response I, as acknowledged on page 3.5-2, Section 3.05, Cultural Resources, of the Draft EIR, "an archaeological resource may not be recognizable or even observable without ground-disturbing activities." Mitigation Measures CUL-A and CUL-C through CUL-E accordingly outline actions that would be taken in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture. The CEQA Guidelines specify that the standards for preparation of a subsequent or supplemental EIR apply only after an EIR has been certified or a negative declaration has been adopted for a project. (*Id*., § 15162(a).) The EIR for the proposed Project has not been certified.

Comment GO18-120 A Paleontological Resources Monitoring and Mitigation Plan (PRMMP) shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring.

Provide a consistent approach throughout the DEIR regarding the use of conditional and declaratory verbs which herein reflects the direct copying of texts from other, unreferenced sources into this DEIR. Provide consistent approach to all remains encountered during excavation.

Provide a thorough construction mitigation program for archaeological and paleontological remains with specific contractual requirements for assessment, encountering, and recovery of all paleontological and archaeological remains. Include

in a thoroughly and adequately revised DEIR for public review and additional comments.

The qualified paleontologist shall supervise the paleontological monitor who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains.

Provide a consistent approach throughout the DEIR regarding the use of conditional and declaratory verbs which herein reflects the direct copying of texts from other, unreferenced sources into this DEIR.

Provide consistent approach to all remains encountered during excavation.

Provide a thorough construction mitigation program for archaeological and paleontological remains with specific contractual requirements for assessment, encountering, and recovery of all paleontological and archaeological remains. Include in a thoroughly and adequately revised DEIR for public review and additional comments.

The frequency of monitoring inspections shall be determined by the paleontologist and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation, and if found, the abundance and type of paleontological materials found.

Provide a thorough construction mitigation program for archaeological and paleontological remains with specific contractual requirements for assessment, encountering, and recovery of all paleontological and archaeological remains. Include in a thoroughly and adequately revised DEIR for public review and additional comments.

95/2 The areas of paleontological sensitivity include all locations where undisturbed Older Quaternary alluvium or the Monterey/Puente Formation may be impacted by the Project. The identification of exact locations to be monitored would be guided in part by geotechnical boring for the Project.

Define “undisturbed” and require all fossils, even in disturbed deposits be recovered and assessed.

Provide a thorough construction mitigation program for archaeological and paleontological remains with specific contractual requirements for assessment, encountering, and recovery of all paleontological and archaeological remains. Include in a thoroughly and adequately revised DEIR for public review and additional comments.

Response GO18-120 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 3.07, Geology and Soils, and Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts to paleontological resources with the implementation of Mitigation Measure GEO-B. Mitigation Measure GEO-B would require the development of a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) to provide direction on the identification of high-sensitivity areas and appropriate monitoring, excavation, and preservation processes during construction excavation activities.

Comment Letter GO19 – Maria S. Salinas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO19

Comment GO19-1 Dear Chair Najarian

On behalf of the Los Angeles Area Chamber of Commerce representing more than 1,400 companies and small business owners in Los Angeles, I write to express our support for the proposed Los Angles Aerial Rapid Transit (LA ART) project. As you know, aerial gondolas are used across the world to connect key districts in cities to improve mobility, reduce greenhouse gas emissions, reduce congestion, and provide entertainment district patrons efficient alternatives to existing travel options.

Response GO19-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their features to enhance and provide additional benefitS to the surrounding communities, including increased mobility options, greater accessibility, shorter travel times, and traffic and emissions reductions for surrounding communities.

Comment GO19-2 The LA ART also has the historic potential to connect El Pueblo, Union Station, Chinatown, Mission Junction, and Solano Canyon, while also providing access to the Los Angeles State Historic Park, the Los Angeles River, and Elysian Park. These are important centers of the Los Angeles culture, history, green space, entertainment, and underserved populations that would see immense mobility benefits should LA ART progress.

Response GO19-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first and last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon. To facilitate this

transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. As discussed in Topical Response N, Environmental Justice, the proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO19-3 Further, these neighborhoods and areas would see measurable benefits for local small businesses and entrepreneurs who thrive on greater numbers of pedestrians, transit riders, and tourists. With a speedy approval of this project it will be built in time for the 2028 Olympic Games and will be a necessary piece of regional mobility for the influx of tourists.

Response GO19-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. As discussed in Section 2.0, Project Description, the proposed Project will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. As detailed in Appendix N, Potential LA ART Tourist Ridership of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles.

Comment GO19-4 Importantly, the LA ART proposal includes a "Community Access Program" that would allow residents and employees of businesses close to the project to ride the gondola using their LA Metro fare, at no additional cost. LA Art proposes a comprehensive vision that considers neighborhood needs, pedestrian improvements, business growth, and mobility enhancements.

For these reasons I strongly support advancing LA ART. If you have any questions, please contact Senior Public Policy Manager Cameron Gil at CGIL@LAChamber.com.

Sincerely,

Maris S. Salinas
President & CEO

Response GO19-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Responses GO19-1 to GO19-3 for discussion of the proposed Project's pedestrian improvements, economic benefits to local businesses, and mobility enhancements.

Comment Letter GO20 – Arts District Community Council, Todd Terrazas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO20

Comment GO20-1 Dear Mr. Zelmer:

Below are comments for the Los Angeles Aerial Rapid Transit Project DEIR.

Arts District Community Council LA (ADCCLA) is a 501c3 nonprofit focused on creating and reserving public green space. We further address government infrastructure and sustainability decisions that could negatively impact the Arts District Community.

ADCCLA became aware of the Project in 2018. In reviewing the scant material provided by LA ART, ADCCLA engaged its board and community members in researching the impacts of the Project.

Response GO20-1 This comment provides a general introduction regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO20-2 through GO20-24.

Comment GO20-2 Description

LA ART intends to build a private aerial tramway on behalf of Frank McCourt to go 1.2 miles from Union Station to near the gold line stop and then over the LA State Historic Park and residential communities to Dodger Stadium. The Project has been billed as a sustainable project that will take 3,000 cars off the road. It purports to be a "privately" funded project created to move people to a single private for-profit enterprise and is being billed as a PUBLIC transportation project. Various non-committal mitigations have been offered in the future that continue to be moving targets for stakeholders to try and unwind.

Response GO20-2 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO20-3 through GO20-24. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response A, SB

44, for discussion of how the proposed Project is public transportation. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA.

Comment GO20-3 Comments:

1. The entirety of the NOP and DEIR is a farce.

    a) The purpose of CEQA is to lay out in detail all aspects of the Project in order for the public and the communities impacted to have a clear and complete understanding of the Project.

    b) To date, the Project has been driven by non-disclosure agreements (NDA) signed by both Metro (the agency overseeing the Project?) and State Parks. The NDA's gave and has continued to give LA ART and Metro cover to hide the full intent and scope of the Project.

Response GO20-3 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of public outreach during the Draft EIR public review period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River.

As discussed in Appendix A, Public Outreach Report, of the Final EIR, during the Draft EIR public review period, eight public meetings were held immediately preceding, during, and immediately following the public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four

held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR

Comment GO20-4

c. Early "public meetings" and requests for support by LA ART were based only on PR comments that have consistently been debunked, along with a host of confused and moving "options" for "mitigation."

d. LA ART's claims of extensive outreach were also debunked, when only 40 people were allowed into those same meetings, and no one was allowed to ask questions except in the chat, most of which went ignored.

Response GO20-4 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public during this period led directly to changes to the proposed Project to incorporate public feedback. The two virtual public outreach meetings conducted by the Project Sponsor in June 2021 were held via Zoom Webinar with a maximum attendance of 500 participants. These meetings included a question and answer session, and attendees could ask questions using the Zoom Q&A and chat functions. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures is consistent with the requirements of CEQA. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how Section 6.0, Design and Use Options, of the Draft EIR includes design and use options responsive to public comments and stakeholder feedback and describes how environmental impacts from implementation of each design and use option would differ from the proposed Project's potential environmental impacts described in the Project Description and analyzed in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, with respect to the particular project component variation. The design and use options provide flexibility for decision makers to potentially adopt one or more minor variations to components of the proposed

Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project.

Comment GO20-5

e. LA ART failed to provide reasonable alternatives to the Project. Only two alternatives were produced and discussed with the public. When the community screamed the loudest over one alternative, it was removed, leaving only one flawed alternative to be publically discussed.

Response GO20-5 Refer to Appendix A, Scoping Report, of the Draft EIR, for a copy of the Notice of Preparation of the proposed Project, which initially offered two options for the proposed Project alignment. In response to stakeholder input during the public scoping period, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station addresses the goal of creating a stronger connection with the Metro L Line (Gold) and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Draft EIR also considered the Spring Street Alignment Alternative and the Transportation Systems Management Alternative. Further, Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project, in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis in the Final EIR because it did not meet most of the basic objectives of the proposed Project.

Comment GO20-6

f. The entirety of the DEIR claims zero environmental impacts on the community and state park. That means:

(1) No noise

(2) No vibrations

(3) No construction impacts

(4) No visual blight

(5) No impact on traffic

(6) No impact on parking

(7) No impact on residential stakeholders

(8) No impact…anywhere. None, nothing.

Response GO20-6 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment GO20-7 g. Visual elements have been egregiously misrepresented in the DEIR, including the park viewshed. Perspective drawings appear to be deliberately skewed. Heights and distances are increased and stretched to create a "nice view." Even the incorrect number of cables has been used to skew and reduce the visual blight the Project would bring.

Response GO20-7 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. KOPs critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. KOPs selected for simulation will appear larger and more distinct than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Further, visual simulations were created to reflect the proposed project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR, for detailed discussion about the implementation and results of the visual simulation. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding ropeway cable design for the gondola cabins. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for a discussion of how the view simulations were prepared, including discussion of how the ropes

would be 1.75 to 2.5 inches in diameter, but are shown in the model with a 6-inch diameter so that they would be visible in the renderings. Additionally, renderings include 3 cables, though some imagery may show only 2 visible cables due to perspective. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment GO20-8 2. Metro is the wrong agency for this Project

As will be opined on by legal experts, Metro is the wrong agency to take the lead on this Project. While it's convenient to place this Project with an agency that has little accountability, it is not a governing agency, meaning that the lead agency must have the governing capacity and natural decision-making powers. Metro has no jurisdictional authority to be the lead.

Response GO20-8 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code Section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with

Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project. Contrary to this commenter's assertion, CEQA does not require a lead agency to be an elected decision-making body. (See generally Pub. Resources Code, § 21067; CEQA Guidelines, § 15367.) Further, CEQA's various requirements for consultation with agencies and for public review and comment ensures the full transparency and accountability of the lead agency.

Comment GO20-9 3. The Project has been improperly placed on Federal funding bundle lists

This would imply that this Project is a done deal which many of us have been told repeatedly by staff members in the former Mayor's Office. This suggests backroom discussions and agreements, pushed through at an all-cost mentality.

Response GO20-9 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. The proposed Project is not included on federal funding bundle lists. Refer to Response GO20-12 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment GO20-10 4. LA ART relies on Vague, Unenforceable, or Deferred Mitigation Measures.

The PR voice of Mitigation has not been taken seriously in this DEIR as the document fails to lay out in detail, nor does it incorporate any of the mitigations publicly spoken about into the overall design of the Project.

Response GO20-10 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, for an overview of the mitigation measures required to mitigate or lessen the proposed Project's potential environmental impacts, including the enforcement mechanisms for each mitigation measure. This comment does not propose any specific mitigation measures that were not incorporated into the Draft EIR, and accordingly no further analysis is warranted.

Comment GO20-11 5. Metro awarded a sole source contract to an unqualified, untested entity.

Frank McCourt, nor LA ART, nor Climate Resolve, nor any other entity formed around the same people are qualified to engineer or construct a private gondola, let alone one claiming to be public transit.

Response GO20-11 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise,

including funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR would include analysis by a team of qualified experts, consultants, and engineers, including Fehr & Peers as to transportation; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; and Nabih Youssef Associates Structural Engineering as to structure engineering. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment GO20-12 6. The "privately funded" Project appears to no longer be "privately funded"

Since efforts to add the Gondola to a federal transportation improvement bundle and improperly pass ownership to another entity that is untested and unqualified again change the playing field.

The right for communities not to be assaulted by backroom deals should override tainted officials.

Response GO20-12 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. As part of this process, Metro has not undertaken any actions or "backroom dealing" that would absolve Metro of its independent judgment in considering the proposed Project and its potential environmental impacts. The proposed Project is not included on federal funding bundle lists.

Comment GO20-13 7. This Project is an assault on communities of color.

The sordid history of the Dodgers and Chavez Ravine in addition to the aberrant treatment of Chinese migrants, seems to have alluded LA ART and McCourt. The idea of "we know what's best for you" is tone-deaf, to say the least.

Response GO20-13 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding communities, and how the Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period, including opportunities for public testimony. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings.

Comment GO20-14 8. Politics are winning over what is best for our communities

At a recent metro Meeting, former Mayor Garcetti likened his colleague representing the impacted community to Mitch McConnell's treatment of SCOTUS because she was doing what her constituents asked her to do. These kinds of comments speak to backroom deals (NDAs), corruption, and an astounding lack of sound judgment.

Response GO20-14 The fundamental goals of environmental review under CEQA are to provide information and allow for a meaningful opportunity for the public to participate in the environmental review process. Metro has and will continue to comply with CEQA and any other applicable statutes or Metro policies regarding public participation and access to information in the decision-making process. As part of this process, Metro has not undertaken any actions or "backroom dealing" that would absolve Metro of its independent judgment in considering the proposed Project and its potential environmental impacts.

Comment GO20-15 9. Over 75 mature-growth trees ranging between 15 and 50' are slated to be removed to accommodate thousands of pounds of concrete.

Response GO20-15 Refer to Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of tree removal and replacement. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located.

Comment GO20-16 30 / 30 California Initiative (CA climate change report) is being entirely ignored by LA ART, Climate Resolve, the City, and Metro.

30 / 30 calls for the preservation/conservation of ALL HABITAT in red zones. Los Angeles County is officially a red zone.

Response GO20-16 The comment cites California's 30x30 initiative, following Governor Newsom issuing the October 2020 Executive Order N-82-20, which committed California to the goal of conserving 30% of its lands and coastal waters by 2030.[66] Under that goal, "an area is considered a '30x30 Conservation Area' if it meets the following definition: land and coastal water areas that are durably protected and managed to sustain functional ecosystems, both intact and restored, and the diversity of life that they support. 'Durably protected and managed areas' within California's 30x30 initiative encompass" areas under government ownership or control or under perpetual easements that are designated to protect species and their habitat. (Pathways to 30x30 California, p. 25.) In implementing this initiative, the California Natural Resources Agency recognizes that the "best available datasets for identifying 30x30 Conservation Area lands in California assign protected areas into [USGS GAP Analysis Program] codes based on the degree of biodiversity protection for conserved areas. GAP status codes 1 and 2 are generally consistent with" the definition of 30x30 Conservation Areas "as they include areas with a high degree of durable protection and management for biodiversity or ecosystem values." "Examples of lands and waters that are often coded as GAP 1 in California include most national parks, wilderness areas, ecological reserves, and wild and scenic rivers . . . Areas coded as GAP 2 in California include most national wildlife refuges, state parks, state conservation areas national seashores, as well as some local and regional open space, private conservation lands and easements." (Pathways to 30x30 California, p. 29.) Based on a search of the California Protected Areas Database[67] and California

[66] Administration of Governor Gavin Newsom. 2022. Pathways to 30x30 California. Available at: https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf. Accessed July 2023.

[67] Map Collaborator. 2023. California Conservation Easement Database. Available at: https://www.mapcollaborator.org/cpad/?base=map&y=37.51844&x=-123.95874&z=6&layers=notes%2Ccced&opacs=100%2C100. Accessed September 2023.

Conservation Easement Database,[68] and their associated GAP codes,[69] the proposed Project alignment is not located within a 30x30 Conservation Area.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, it is anticipated that mitigation ratios for trees on land administered or managed by responsible agencies would be agreed to as part of the approvals required for implementation of the proposed Project. The proposed Project would provide a minimum replacement ratio of 1:1 for all trees removed in the Los Angeles State Historic Park and a replacement ratio of 1:1 for all large trees removed in the State Route (SR) 110 California Department of Transportation (Caltrans) ROW. As discussed in Section 4.1.3, Impacts to Wildlife from Tree Removal, of Appendix G, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In addition, the only areas of tree removal that could be potentially described as wooded habitat are the following: the small grove of Fremont cottonwood trees at the western end of the Los Angeles State Historic Park, the non-native woodland at the Stadium Tower and associated fire buffer, and the non-native woodland at the Dodger Stadium Station location. The total area of wooded habitat that would be removed in each of these areas is 0.24, 1.02, and 0.39 acres, respectively. This area of wooded habitat is relatively small compared to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park. Accordingly, while the removal of trees will result in a marginal reduction of suitable tree habitat in the short-term, such habitat loss would not result in substantial population level impacts. Moreover, in the long-term, the replacement of trees proposed for removal would more than offset any realized impacts associated with the proposed Project.

[68] http://www.mapcollaborator.org/cpad/?base=map&y=37.50973&x=-123.94775&z=6&layers=notes%2Cced&opacs=100%2C100 (last accessed July 6, 2023).

[69] USGS Protected Areas Database of the United States, https://www.arcgis.com/home/item.html?id=e20f27c6af5a49b289bea1ba05b4986b (last accessed July 6, 2023).

Comment GO20-17 10. Gondolas are not, in any way, shape, or form, new technology.

New for LA is not new and innovative to anyone but LA ART.

Response GO20-17 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. As discussed in Appendix D, Technology Penetration Analysis, of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and will introduce the first aerial gondola system to the Los Angeles area, which represents the first aerial gondola system in a densely populated area of the United States since 2007. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment GO20-18 11. This Gondola is NOT public transportation.

This is a private project, benefitting a private entity. Period. Public Transportation moves people to and from more than one environment. A stop at the Chinatown station is duplicative and is not needed. Additionally, the Dodger express represents non-invasive buses (soon to be fully electric) already routed and funded.

Response GO20-18 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of

the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

Comment GO20-19 12. LA LART continues to offer no evidence that communities will benefit from increased foot traffic in their neighborhoods.

Indeed, the reverse seems to be true in that the hike to reach Broadway would be unreasonable and time prohibitive in both directions.

Response GO20-19 Refer to Topical Response C, Project Features, discussing how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Additionally, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/ last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station, and would include signage to support wayfinding for transit passengers. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how mult-imodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. The Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities.

These features of the proposed Project, including the intermediate Chinatown/State Park Station closer to the core of Chinatown, were provided in direct response to input from the public during the public scoping period for the Draft EIR in October 2020 hosted by Metro, and the June 2021 virtual public outreach meetings conducted by the Project Sponsor. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder

input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River.

As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment GO20-20 13. Climate Resolve is not included in the DEIR as the managing/contracting entity.

Despite press releases and conferences, Climate Resolve, the latest entity to have become embroiled in this sham of a Project, is actually not included in the DEIR as there is no agreement in place, making the claims appear to be more about taking the heat off of McCourt and moving it to yet another unqualified entity. The legality of doing this midstream CEQA is also questionable at best.

Response GO20-20 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response GO20-11 for discussion of the preparation of the Draft EIR.

Comment GO20-21 14. Digging into severely toxic soil

While significant remediation was done in the park to make sure that it was safe for all, deeper levels of soil, both at the park and surrounding areas, have a long, dark history of toxic and deadly soil contamination. No study was presented or addressed

that would show that the public would be safe stirring up and unearthing severely toxic soil.

Response GO20-21 Refer to Section 3.09, Hazards and Hazardous Materials, and Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, for discussion of the potential for soil contamination. The Draft EIR acknowledges and discloses the historical use of the Los Angeles State Historic Park site, including past use and storage of petroleum products and other materials that resulted in impacts to soil and groundwater. The status of remediation efforts and the potential for encountering contaminated soils at this location is disclosed on pages 3.9-16, 3.9-17, 3.9-23 and 3.9-24. Additional information, including a summary of database search results, remediation efforts, and reviewed documents related to the Los Angeles State Historic Park site is set forth in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, on pages 6-8, 6-9, and 10-2.

Mitigation Measure HAZ-A requires implementation of a Soil and Groundwater Management Plan (Management Plan) during work at the Los Angeles State Historic Park site. The Management Plan will include the methods and procedures for sampling and analyzing soil and groundwater during construction to classify them as either hazardous or nonhazardous; and if identified as hazardous, the Management Plan will specify the applicable methods and procedures (1) for the proper handling and removal of impacted soils and/or groundwater for offsite disposal and/or recycle in accordance with current federal, state, and local regulations, and (2) to be protective of workers and the environment.

Comment GO20-22 15. Project Alternatives

Both the no-project alternative and the Dodger Express were left out of all public communication of available alternatives offered during all aspects of the process. The existing Dodger Express has been consistently cited as the preferred method of transport by community stakeholders.

The infrastructure already exists, and the Dodger Express team has committed to electrifying all the buses as a response to climate change. This alternative is preferred by our community and stakeholders at large as it does not pour thousands of pounds of concrete into an already stressed community and DOES NOT REMOVE ANY EXISTING HABITAT.

Response GO20-22 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's

underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Responses GO20-16 and GO20-17 for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant with implementation of mitigation. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, for discussion of the environmental setting of the proposed Project and the lack of wildlife habitat and native vegetation within the Biological Survey Area (BSA). No native plant communities occur within or adjacent to the BSA and there are no wildlife corridors within the BSA to support movement of wildlife species. No sensitive habitats such as wetlands, oak woodlands, or coastal sage scrub habitat are present within the BSA. Refer to Response GO20-16 for a discussion of how although the removal of trees in connection to the proposed Project will result in a marginal reduction of suitable tree habitat in the short-term, such habitat loss would not result in substantial population level impacts. Moreover, in the long-term, the replacement of trees proposed for removal would more than offset any realized impacts associated with the proposed Project.

Comment GO20-23 Conclusion

It is our observation and assumption that this Project is yet another lousy idea being rammed down the throats of our communities to satisfy a check box for the Olympics. The Olympics has traditionally created unwarranted hardships on communities, and this Project is no exception.

The manner in which electeds and Metro have conducted this process is utterly shameful and displays a flagrant disregard for the residents and communities being impacted, not to mention the law. Simply reframing the argument to make it look awesome doesn't change the fact that the premise is based on a lie with a complete and appalling disregard for CEQA and the law in general.

We ask that this Project be summarily "wished back into the cornfields." As of this letter 3,501 signatures have been collected from the surrounding neighborhoods vehemently opposing this Gondola.

Response GO20-23 This comment provides a general summary regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO20-2 through GO20-22. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for

discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Further, the Draft EIR complied with CEQA's requirements, providing the necessary analysis to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts.

Comment GO20-24 It is not wanted. It is not needed. It will exacerbate the climate crisis within LA City by pouring thousands of pounds of concrete into a community already registering at a 2% or lower tree canopy.

Response GO20-24 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Responses GO20-16 and GO20-17 for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant with implementation of mitigation.

Comment GO20-25 This Project is riddled with violations of process, violation of the law, willful disregard of the public's right to know, and a willful disregard for communities of color.

This Project should be immediately terminated, and Mr. McCourt be told, "thanks, but no thanks."

Sincerely,

Todd Terrazas
President

Cc: Supervisor Hilda Solis
Mayor Karen Bass
Congressmember Jimmy Gomez
Assembly Member Miguel Santiago

Response GO20-25 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO20-2 through GO20-24.

Comment Letter GO21 – LA River State Park Partners

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO21

Comment GO21-1 Dear Mr. Zelmer

I write to express our deep concerns with the proposed Los Angeles Aerial Rapid Transit Project (LA ART). I represent the Los Angeles River State Park Partners (LARSPP), the nonprofit support organization (and State Parks Cooperating Association) for the three state parks along the Los Angeles River – Los Angeles State Historic Park, Rio de Los Angeles State Park, and the Bowtie Parcel. These three urban state parks serve historically underserved, park-poor communities and represent an intentional investment by the taxpayers of the State of California to re-dress historic inequities and preserve key historic elements of Los Angeles.

As Executive Director of LARSPP, I have extensive on-the-ground experience with the day-to-day operations of these parks, as well as knowledge of their creation, development, and ongoing needs.

Response GO21-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO21-2 Our focus is on the considerable impacts of this project to Los Angeles State Historic Park (LASHP), a publicly funded green space that residents fought for decades to establish. The proposed gondola tramway route would cross one end of the 32-acre park with cables carrying gondola cars just 26 feet overhead, and a station building with a 98-foot-tall tower. The project would require the taking of park land for the footprint of the station, replacing 81 mature trees with hardscape…

Response GO21-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade

where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment GO21-3 …and would permanently alter the carefully designed vistas of the park, key features identified in the park's 2005 General Plan.

Response GO21-3 Refer to Response S2-5 for a discussion of aesthetic impacts to the park. The Draft EIR addressed aesthetic impacts in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment of the Draft EIR. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within

the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. The Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment GO21-4 Despite these major impacts, the DEIR states that "The proposed Project would not result in any significant and unavoidable operational impacts," and concludes that "no mitigation measures required" (ES 10 p.29 and ES 12 p.31). We strongly disagree with this conclusion.

Response GO21-4 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Response GO21-5 for a a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan and Mitigation Measure LUP-A.

Comment GO21-5 This unsubstantiated finding is further complicated by the fact that the DEIR does identify as a "Significant Impact" the conflict with the LASHP General Plan. The DEIR describes as a "mitigation measure" the need to: "Obtain a Los Angeles State Historic Park General Plan Amendment (page 58, DEIR Executive Summary, Land Use and Planning element, LUP-2). The project asserts that "Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles

State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan." The current general plan for this park does not allow for transit uses within the state park because it is a park, a vital public green space in a historically underserved community. Putting a transit use within the park was never envisioned during the park development process and it will significantly impact the park user experience. Yet the DEIR simply claims that as long as the general plan document is amended to allow for transit, that mitigated the impact. In no way does an amendment in a document mitigate the on-the-ground impacts of an aerial highway through a park, or the project's usurpation of public property.

This notion that the impacts to the park will disappear with a General Plan amendment is absurd on its face.

Response GO21-5 Refer to Response GO21-4 for a discussion of how the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO21-6 Amending the General Plan of a State Park to make way for a private transit station represents a terrible precedent. Beyond these fundamental objections, we identify the following specific areas where the DEIR analysis has either been insufficient or where impacts are incorrectly dismissed as not significant.

1. Use of Park Land

The DEIR describes the Chinatown/State Park station located in section 2.5.1.3. It notes that the southern portion of the station would be on a City of Los Angeles ROW, while the northern portion of the station would be integrated into the southern

boundary of the Los Angeles State Historic Park. This statement is highly misleading. Integration into a boundary implies something welcome and beneficial. This, rather, is a very tall, obtrusive building encroaching on state park land. Our public park has only 32 acres and cannot afford to lose acreage to a private project that benefits a private owner and individuals choosing to attend private events at a private stadium. The DEIR states that the station would take 2,195 square feet of state park property and an additional 9,320 square feet over the park from the station canopy. This would transform the park's entrance from one that feels pastoral and peaceful to a shaded, dense, built space. It shrinks the size of the park and takes parkland away from a community who fought hard to create it.

Response GO21-6 This comment provides a general recitation and characterization of the Draft EIR. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. While the Chinatown/State Park Station's footprint will occupy 2,195 square feet within the park, through continued collaboration with State Parks, which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from the park's purpose and objectives. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. In addition, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the

Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. In addition, the station canopy would provide much needed shade. As discussed in Topical Response F, Los Angeles State Historic Park, the Project Sponsor would work with State Parks through the General Plan Amendment process to develop an "Interpretation Plan" to identify unique ways to use the proposed Project to provide interpretation for the park and its history. The Interpretation Plan would help ensure that the proposed Project is a benefit to Los Angeles State Historic Park by providing visitors with, consistent with the park's existing General Plan, an engaging and informative experience that deepens their understanding and appreciation of Los Angeles State Historic Park's culture and history as a former and current (should the proposed Project be developed) transportation hub.

Comment GO21-7 On pages 2-61, the DEIR also outlines various approvals the applicant would need to obtain from the CA Department of Parks and Recreation (DPR). It notes the need for a lease or an easement to allow for the construction and operation of the project.

We wish to point out that the application could not obtain and easement because easements are governed by PRC 5003.5 and require the department to specify conditions to allow minimum alteration to the physical features of the park and minimum interference with the use of the park by the public (emphasis added). Taking parkland permanently for a large station is a substantial alteration of the physical features of the park. This station would interfere with the uses of the park currently enjoyed by the public who paid for its creation. Furthermore PRC 5012 restricts easements to public agencies for public purposes. The gondola is a private project.

Response GO21-7 Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO21-8 We further note that this project could not proceed using a lease from DPR. The PRC 5003.17 specifies that the department may lease any parcel only if the director finds that the use would be compatible with the use of the real property as a unit or part of a unit, and with the sound management and conservation of resources within the unit. A new private gondola station is not compatible with the uses of the park and is certainly not in furtherance of sound management and conservation of the resources of LASHP.

Response GO21-8 Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment GO21-9 2. Tree Removal

The DEIR states that the project for the Chinatown/State Park Station would require the removal of 30 trees, and the aerial rights across the park would remove an additional 51 trees. The DEIR states that in place of the lost trees would be hardscape and replacement trees elsewhere in the park. Mitigating the loss of mature trees, particularly protected native trees, with new trees is insufficient; mature trees have established complex and interconnected ecologies not easily replicated, and they sequester much more carbon than do young trees.

The DEIR also does not indicate where the replacement trees would be sited and does not provide sufficient information to demonstrate that the alternative locations of new trees would maintain the current park experience and ecosystems. The park was thoughtfully designed by landscape architects with specific outcomes in mind to accommodate a variety of human and wildlife activities. The park is a careful balance of open space and tree canopy that allows for flexible uses, including special events such as music festivals. The landscape plan was developed based on an extensive public planning and visioning process, and further refined to accommodate large-scale special events.

It is not possible to simply plant 81 trees on the remaining property without potentially altering the use patterns of the park.

Response GO21-9 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 4.1.2, Location of Tree Replacement, of Appendix G, for a discussion of how replacement trees would be planted as near to the location of removal as possible, and that tree replacement locations would be coordinated with the landowner or party responsible for managing the land, including the California Department of Parks and Recreation.

Refer to Response GO21-11 for a discussion of how over time, replacement trees would obtain similar carbon sequestration benefits as the existing trees.

Comment GO21-10 In addition, the ratio of tree replacement should not be a 1:1 ratio, but rather, a mitigation ratio such as 5:1. In the case of native cottonwoods, for example, mature trees are not available for purchase, so it could be a matter of planting 5 immature trees for every mature free removed (at 6-7 years old, the park trees would be considered mature). Replacement at this rate in other areas of the park may not be feasible as it would reduce the amount of overall open space and diminish the capacity for flexible use. Thus, the public ends up losing open space in the rest of the park with this proposed mitigation scheme.

Response GO21-10 Refer to Response GO21-9 for a discussion of how the proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment GO21-11 Trees also require proper space and maintenance, especially in the early years. This project is setting back a decade of tree growth and shifting the burden of maintaining new trees on to the DPR staff. There is no guarantee that the same level of carbon sequestration could be replicated (we believe it would not), thus negating the 'zero emission' claim currently used by LA ART. The destruction of 81 mature trees is not "insignificant" as the DEIR claims.

Response GO21-11 Refer to Response GO21-9 for a discussion of tree removal and replacement in the Los Angeles State Historic Park. Refer to Section 3.08, Greenhouse Gas Emissions, of the Draft EIR for discussion of how the proposed Project would result in a net decrease of in GHG emissions compared to existing conditions. While there may be short-term losses in carbon sequestration related to the removal of trees, the proposed Project would implement BIO-PDF-F and would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located. Accordingly, the short-term losses in carbon sequestration would occur only in the interim as replacement trees grow to the size of the existing trees. Nevertheless, over time, replacement trees would obtain similar carbon sequestration benefits as the existing trees and would be coupled with a net decrease of approximately 6,375 metric tons of CO2e per year in GHG emissions from the proposed Project. Even if the sequestration achieved from replacement trees is less than the sequestration that would have occurred from the existing trees, it would not change the impact conclusion related to Greenhouse Gas Emissions because the proposed Project will not result in a net increase in GHG emissions. As indicated in Section 3.08, Greenhouse Gas Emissions, the proposed Project is an innovative

alternative transportation development with the benefit of reducing VMT, which reduces air pollutants and GHG emissions associated with vehicle trips. The Draft EIR demonstrates that the proposed Project would result in a net decrease of approximately 6,375 metric tons of CO2e per year at its horizon operational year 2042, resulting in a less than significant impact related to GHG emissions.

Comment GO21-12 3. Impact on Historic Resources: the Zanja Madre and Roundhouse

The Zanja Madre, or "mother ditch," is the original water conveyance pipeline that brought water from the LA River to El Pueblo de Los Angeles. During excavations in the late 1990's, Metro unearthed a portion of the original brick pipeline on the site that is now the park. This was one of the key factors of historic significance that led the State Park Commission to classify this new park as a State Historic Park. This exposed section of the Zanja Madre near the Metro track is currently a major historical attraction of the park, the views of which would be significantly impacted by the overhead gondola route.

Response GO21-12 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources, including the Zanja Madre, would be either less than significant or reduced to less than significant with mitigation. The exposed section of the Zanja Madre located northwest of the Los Angeles State Historic Park near the intersection of North Broadway and Bishops Road is denoted as P-19-190309. This resource will not be directly impacted by construction given that it is located outside of the proposed Project footprint. Further, operational impacts to the setting, including potential visual impacts, are less than significant because the resource's setting has already been substantially altered from its historic state. Refer to pages 42, 52, and 91 of Appendix F for further information about P-19-190309. The views of the Zanja Madre would not be impacted by the proposed Project. Refer to Response S2-5 for a discussion of how the proposed Project would not substantially impact views, and how the proposed Project would provide a view of the exposed Zanja Madre, which is currently not visually apparent from the park.

Comment GO21-13 There has also been a long-standing interest in looking for other elements of the original Zanja Madre in El Pueblo Historic Monument. This archaeology has not yet been conducted. It is possible that the construction of the proposed Alameda Station could unearth and damage this resource, yet the EIR is silent on the potential of this finding.

Response GO21-13 Refer to Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project of the Draft EIR for a discussion of the proposed Project's potential impacts to archaeological resources, including the Zanja Madre. As noted on page 3.5-58, the section of the Zanja Madre recorded within the western area of the proposed Alameda Station is denoted as P-19-000887. This segment was capped in 1978 for preservation, is currently denoted by decorative pavement, and would not be impacted by the proposed Project. As noted on pages 3.5-58 and -59, the proposed Project has potential to significantly impact buried, unrecorded material in other portions of P-19-000887 and, as such, mitigation measures related to archaeological testing and recovery have been proposed that will reduce impacts to the resource to less than significant. Refer to Section 3.5.6 for a list of proposed mitigation measures for cultural resources for the proposed Project, including Mitigation Measure CUL-A, which requires a Cultural Resources Monitoring and Mitigation Plan (CRMMP) be prepared by a qualified archaeologist prior to project construction. Additionally, Mitigation Measure CUL-A requires the CRMMP be applicable to all ground disturbance extending into native soil with known archaeological sites and other areas of high sensitivity, and accounts for the unanticipated encounter of previously unknown and undocumented archaeological resources, requiring protocols for such an event. Mitigation Measure CUL-A also would incorporate specific requirements related to the Alameda Station, requiring monitoring for ground-disturbance activities to the maximum depth of planned excavations at Alameda Station. In addition, Mitigation Measure CUL-C requires an archaeological testing plan to mitigate potential impacts to portions of the Zanja Madre. The testing plan will propose limited archaeological excavations to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed project and, if preservation in place is not feasible, require data recovery excavations and a data recovery plan if significant archaeological remains are encountered that appear to contribute to the significance of the overall site.

Comment GO21-14 As an organization committed to preserving the history of Los Angeles as embedded in the elements of the LASHP, we would also like to note that the Alameda Station would significantly alter the historic and cultural setting of El Pueblo Historic Monument, particularly Olvera Street. It is important to remember that as recently as 2015, the American Planning Association named Olivera Street as one of the 15 Great Places in America. El Pueblo is listed on the National Register of Historic Places. These designations look at both the buildings and setting. The DEIR dismisses the impacts of its large Alameda station on this historic resource without confirming that the project would not jeopardize these national designations. El Pueblo is also an essential stop along two national historic trails: the Juan Bautista de Anza National Historic Trail and the Old Spanish National Historic Trail.

Response GO21-14 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of this Draft EIR for discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Plaza Historic District. As discussed on pages 3.5-45 to 3.5-46 of the Draft EIR, the only direct impacts from the proposed Project would be to a non-contributing feature, the Placita de Dolores, which was constructed after the historic district was designated, and accordingly impacts would be less than significant. With respect to indirect impacts, while the proposed Project's Alameda Station would add another non-original element to the broader setting, mere visibility of a new building, structure, or feature from certain vantage points alone would not result in an indirect impact. The proposed Project would introduce a visible new feature to the historic district's setting, but Alameda Station, with the exception of the vertical circulation and associated alterations to the non-contributing plaza space, would be located outside of the historical resource's boundary, and contributing buildings would retain their visual and physical relationships with one another. As discussed in Section 3.05, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant. Moreover, while the "Great Places in America" list does not have any CEQA or historical significance, as it is simply a listing of a professional, educational organization's (the American Planning Association) recognition of 303 "great places" that "make communities stronger and bring people together through good planning,"[70] the proposed Project would help strengthen Olvera Street's placement on this list. The APA recognized that "[t]he adjacent Union Station Master Plan work will continue to improve pedestrian connections between Olvera Street and the key transit hub of the greater Los Angeles area."[71] Further, the website recognizes that "Los Angeles's Union Station is directly east of Olvera Street, and has become the hub of the city's Metro Rail system. Implementation of the Union Station Master Plan will link the revitalized transit hub directly to Olvera Street and the Plaza." As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station location was selected because of its safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, inclusive of Olvera Street. The proposed Project would also include a new pedestrian plaza at El Pueblo. Accordingly, the proposed Project would bolster pedestrian and transit connections to El Pueblo and Olvera Street, consistent with the APA's recognition of Olvera Street as a "great place." Additionally, as the comment notes, the Los Angeles Plaza Historic District (El Pueblo National Monument) is located along two historic trails, the Juan Bautista de Anza National Historic Trail, and the Old Spanish National Historic Trail. The Juan Bautista de Anza National Historic Trail is a trail comprising the

[70] American Planning Association (APA). 2023. Great Places In America. Available at: https://www.planning.org/greatplaces/. Accessed August 2023.

[71] American Planning Association (APA). 2015. Olvera Street Great Places. Available at: https://www.planning.org/greatplaces/streets/2015/olverastreet.htm. Accessed August 2023.

overland route traveled by Captain Juan Bautista de Anza of Spain during the years 1775 and 1776 from Sonora, Mexico, to the vicinity of San Francisco, California, of approximately 1,200 miles through Arizona and California. The Old Spanish National Historic Trail is an approximately 2,700-mile-long trail extending from Santa Fe, New Mexico, to Los Angeles, California, that served as a major trade route between 1829 and 1848. The proposed Project would serve to provide greater access to these historic trails. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment GO21-15 Another key historic element of LA State Historic Park is its history as the Southern terminus of the Transcontinental Railroad and home of Southern Pacific Railroad's River Station, built in 1875. Often referred to as "LA's Ellis Island, the Station was where many 19th- and early 20th-Century newcomers first arrived to the city. The original roundhouse footings have been carefully excavated and this sensitive area is protected by department staff whenever staged events are considered (this point will be further discussed in section 6).

Response GO21-15 Refer to Section 3.05, Cultural Resources, and Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR for a discussion of archaeological resources at the Los Angeles State Historic Park. As discussed in Section 3.05, the Chinatown/State Park Station footprint is entirely located within the boundary of Resource 19-003120 (consisting of the remains of the Southern Pacific Railroad's River Station). Extensive archaeological work has been conducted at the site, and when the Chinatown/State Park Station (including the construction staging area) is overlaid on an archaeological sensitivity map developed by California State Parks, it appears that the Chinatown/ State Park Station is located in an area not identified as low sensitivity for archaeological resources by State Parks. The Draft EIR therefore concluded that impacts related to construction of the Chinatown/State Historic Park Station could be potentially significant if an unknown archaeological resource is identified during construction. To mitigate for these potential impacts of an inadvertent discovery of the resources known to exist in the resource boundary, Mitigation Measure CUL-E would be required, which would necessitate an archaeological testing plan be prepared and implemented, and a data recovery plan be prepared and implemented if significant archaeological remains are encountered during test excavations which cannot be avoided (i.e., if preservation in place is determined to be infeasible). This would be done in consultation with California State Parks and consultation with SHPO would also be required pursuant to Public Resources Code section 5024.5.. This consultation would be specific to the possible archaeological features that might be encountered at the Chinatown/State Historic Park Station and the park amenities. The testing plan would propose limited archaeological excavations of a portion of the

site overlapping the Area of Direct Impacts intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. If significant archaeological remains are encountered within the footprint of the Station foundation and columns, rendering preservation in place infeasible, a data recovery plan would be implemented to mitigate the impacts to less than significant. The data recovery plan would specify what is to be excavated, describe the specific tools, screening size, and methods to be used, and describe how structural remains, if any, would be exposed and mapped. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations, that contribute to the significance of 19-003120 are identified in the area where the park amenities (e.g., the concessions and restrooms) are proposed, Mitigation Measure CUL-F would provide for a redesign for those structures to attempt to avoid the remains. If redesign is not possible, then the above data recovery plan would cover this area as well in order to mitigate impacts to less than significant. With implementation of Mitigation Measures CUL-A, CUL-B, CUL-E, and CUL-F construction of the proposed Chinatown/State Park Station would result in a less than significant impact related to a substantial adverse change in the significance of archaeological Resource 19-003120, as discussed in further detail on pages 3.5-61 to 3.5-62 of the Draft EIR.

Comment GO21-16 4. Impact on Viewsheds

The park's 2005 General Plan identifies and emphasizes the view of downtown LA from this park, "…the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. Sometimes referred to as the "front porch" of the City, there are no other sites that capture this welcoming view of downtown Los Angeles (p. 38). The park design was created to optimize the opportunities for visitors to experience this view – a major park element accessible from most vantage points.

The station and gondola lines with their constant movement will degrade that viewshed, blocking the view from some vantage points. The DEIR images are inadequate to fully capture the impact of the station on the view of downtown from numerous places in the park. Putting a large-scale station at the end of the park will affect the park experience from multiple vantage points, especially from the bridge. What is currently a spectacular vista will now be marred by a new large building that encroaches on state park land, with constant movement emanating out of that building. This is a fundamental change in the park experience and is inconsistent with the original vision outlined in the General Plan.

Response GO21-16 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain

viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including at Los Angeles State Historic Park. Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relates to aesthetics.

Comment GO21-17 We are also concerned that views of Elysian Park and the Historic Broadway Viaduct will also be severely impacted from certain vantage points within the park.

Response GO21-17 Refer to Response GO21-16 and Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As discussed in Section 3.01, the Chinatown/State Park Station location in the southernmost portion of the park would not block any designated scenic vistas, alter scenic resources, or block panoramic views, including views of Elysian Park and the Broadway Bridge to the north. Impacts to scenic or panoramic views would be less than significant.

Comment GO21-18 5. Impact on Park Users

One of the key elements that came out of the numerous public meetings during the park's design was the desire for quiet and tranquility. This gondola's continuous movement a mere 26 feet overhead will fundamentally alter the sense of peace and quiet in the park, a rare place of respite in a very dense, park-poor area of Downtown LA. The DEIR illustrations are highly misleading and show gondola cars, cables, and towers from a far distance, not from the vantage point of being directly overhead park users. The renderings are purposely not to scale and fail to demonstrate how the project would impact an individual sitting on a knoll right under the gondola line.

Response GO21-18 Refer to Response GO21-2 for a discussion of how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the noise impacts from the proposed

Project, including in the Los Angeles State Historic Park. As detailed therein, operational noise impacts would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, to this Final EIR for a discussion of how the KOPs were prepared. The renderings were not altered and accurately depict how the proposed Project will appear in the existing environment. The "after" KOPs are visual simulations that reflect the proposed project components and were prepared using a digital model to accurately place the proposed Project into context without distortion. Because the proposed Project is rendered in perspective to match the pedestrian eye level vantage point of the existing photographs, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance, consistent with how pedestrians experience their surrounding environment. As such, visual elements that are in the foreground can sometimes block the full view of visual elements at a distance even though the foreground element may be of a smaller dimension. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional visual simulations of the Park to further analyze viewshed impacts to the Park, in response to comments received on the Draft EIR during the public review period.

Comment GO21-19 The DEIR dismisses the importance of open space to provide a respite from urban life when it states "Los Angeles State Historic Park is in a highly urbanized area north of downtown Los Angeles. Recreationalists that may reside in the area are assumed to be accustomed to the urban edge of the park, of which the proposed Project would become a part." (p.74). In other words, LA ART claims it is acceptable to eliminate a portion of a public park simply because urban residents who live in an urban area are used to urban edges.

Response GO21-19 Refer to Response GO21-2 for a discussion of the footprint and location of the proposed Project within the park; how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project; and the proposed Project's additional benefits to the Park. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Comment GO21-20 The entire point of the considerable investment of state taxpayer dollars to acquire and develop LASHP was to create an anecdote to urban life, bringing a major open green space, with all the associated health and wellness benefits, to those who had no such amenity. The DEIR is highly misleading to suggest that taking scarce park land and 81 mature trees, replacing them with hardscape, bathrooms and a new concessions building, and running an aerial highway across the park with gondola cars

passing every 30 seconds is somehow making the project a "part of the park." It is, in fact, destroying the park's southern end, not enhancing it, or providing contributing elements.

Response GO21-20 Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.4, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO21-21 State Parks, LARSPP, and one of our key community partners, Clockshop, stage an annual Kite Festival at LASHP. Kite flying is an identified use in the park's General Plan, and the park's design ensured kites would have adequate space. The Kite Festival has grown year over year and now attracts thousands of visitors. The south lawn is an important part of this event, and the gondola would preclude that use, thus moving more people into a smaller space. This represents an additional project impact that the DEIR dismisses as insignificant.

Response GO21-21 Refer to Response GO21-2 for how, as discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the

vast majority of the Park for kite flying would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO21-22 The DEIR asserts that the project is consistent with a goal of the Cornfield Arroyo Seco Specific Plan (CASP) to increase access to open space. It claims that the gondola would provide greater access to the park. However, the existing Metro L (Gold) Line already provides convenient public transit access to the park. We would argue that eliminating open space through the taking of park land is not consistent with increasing access to open space, especially when this "increase" is merely duplicative of an already existing transit service.

Response GO21-22 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first / last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Moreover, compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less Refer to Response GO21-2 for a discussion of the footprint and location of the proposed Project within the park; how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project; and the proposed Project's additional benefits to the Park. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO21-23 6. Impact on Park Operations & Revenue

The proposed project alignment cuts across areas that are frequently used as concert venues, a carefully planned designated use in the park's planning process. These evening concerts are an essential part of the financial viability of the park and provide necessary revenues that directly fund ongoing park maintenance and preservation, habitat creation, and a rich array of free community programs – from arts and culture events, school programs, and our new Farmers' Market, to food distributions for seniors and wellness classes of all kinds. Since concert events restrict the public's use of the park, State Parks limit the number of large events so as to maximize revenues while minimizing park access restrictions.

During the design phase of LASHP, the staff of State Parks met with concert promoters, cultural resource experts, and natural resource specialists. This process resulted in the identification of two preferred concert areas that minimize noise,

protect the cultural resources such as the roundhouse, and protect wildlife, especially birds that are now populating the wetland portion of the park's north end.

The main stage is on the main lawn in the middle of the park, and the second stage is directly underneath the proposed flyway of the gondola, rendering it unusable in the future.

Every major concert that books an event at LASHP currently uses both stages. Eliminating the southern stage would cause promoters to seek other venues and result in lost revenues.

Response GO21-23 Refer to Response GO21-2 for a discussion of the footprint and location of the proposed Project within the park and how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Section 5.5.2, Special Events at the Los Angeles State Historic Park, of Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of how due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project does not significantly reduce the event space area within the Los Angeles State Historic Park. Refer to Response GO21-24 for a discussion of the potential stage locations for events at the Los Angeles State Historic Park, and how it will continue to be possible for most events to take place under the majority of the alignment within the park and adjacent to the alignment. In addition, the access road currently used for event set-up and breakdown would continue to be available for use. The proposed Project could affect the ability to use areas directly beneath the alignment for certain specific special event structures, however, the proposed Project alignment over the park is largely over a hill where it is difficult to stage special events, and the park does not include in their planned locations for special events. Due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project would not significantly reduce the event space area within the Los Angeles State Historic Park or limit the number of people that can attend events at the park.

Comment GO21-24 As noted in section 3 of this letter, the roundhouse is a significant archaeological site. The second stage therefore cannot be relocated to the roundhouse area, contrary to the claims of the DEIR in Figure 5-3. This graphic suggests that the second stage could be moved directly OVER the roundhouse area. The department has never allowed a large stage with loud music to be placed over the round house. The vibrations from the music could potentially damage the excavated archaeological site that lies below ground level here. The second stage cannot be moved closer to the northern part of the park either because that would disturb wildlife that has taken up residence as the park's native habitat matures.

Thus, the gondola path effectively eliminates the second stage, thereby reducing the size of events that hence would reduce revenues. State Parks could not maintain the revenue stream by substituting more frequent, smaller events without having a major impact on park users. Every event requires partial closure so increasing the frequency to make up for the loss of the major events is not compatible with a public park. These indirect impacts on the gondola cables over the southern part of the park are not disclosed in the DEIR and represent a significant impact to the operations and financial viability of the park, as well as the ability of the state to staff and maintain the park.

Response GO21-24 Refer to Response GO21-2 for a discussion of the footprint and location of the proposed Project within the park and how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Section 5.5.2, Special Events at the Los Angeles State Historic Park, of Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of how due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project does not significantly reduce the event space area within the Los Angeles State Historic Park. The referenced Figure 5-3 was obtained from the California Department of Parks and Recreation and the aerial easement required for the proposed Project was layered on top. The map sent by the California Department of Parks and Recreation shows the "typical layout options for large events based on past experience." Indeed, as an example, the event diagram from the 2018 La Tocada Music Festival shows stages in approximately the same locations as displayed in Figure 5-3.

Comment GO21-25 We are also concerned that the parking lot at the park will fill up during game days with people heading up to Dodger Stadium, thereby restricting access to those who wish to visit the park. The DEIR identifies numerous parking opportunities in the

Chinatown area, including the State Park. Given that the park's lot will be the most convenient for gondola riders, we would expect our lot to fill first.

Response GO21-25 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The Los Angeles State Historic Park has and would continue to have the ability to implement parking management of its parking lot.

Comment GO21-26 7. Meaningless Offer of 'New' Facilities

The addition of a concession building, and a restroom as noted in Section 2.5.1.3 does not improve the park. There already exists a viable concession at the park, Cargo Cafe, which would be negatively impacted by this project. The bathrooms outlined in section 2.5.1.3 serve the needs of the private gondola station, not the public State Park. If State Parks had additional funds for bathrooms, this is not the likely location they would site them.

Response GO21-26 Refer to Response S2-4 regarding how the proposed Project would be integrated into the park. The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. Through continued collaboration with State Parks which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from the park's purpose and objectives. For example, in addition to the concessions, restrooms, and breezeway, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex.

Comment GO21-27 The bridge over Broadway, identified as Design Option E (p. 21 Exec Summary), is a red herring. This bridge has already been identified as a key missing element, has

been designed by State Parks, and has been targeted as a long-range goal to be funded by State Parks.

Response GO21-27 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge

Comment GO21-28 LA ART makes no promises of funding this bridge so including it in the DEIR merely confuses and misleads the public into thinking these two projects are somehow linked. They are not. Eventually the Broadway bridge will be funded and built, if not now then from a future bond measure.

State parks typically take decades to be fully realized and we recognize that LASHP still has missing elements. However, the inclusion of Design Option E in the DEIR suggests a quid pro quo: destroy the southern part of the park in exchange for a bridge up to Broadway that would be funded by taxpayers. It is a cynical attempt to confuse the public into thinking the gondola project would be the reason a bridge would be built, when in fact, this bridge will become a reality anyway in the future with public funds.

Response GO21-28 Refer to Response GO21-27 regarding Design and Use Option E.

Comment GO21-29 In Conclusion

We find this project highly objectionable from an environmental justice perspective. LA State Historic Park was born from an outpouring of community activism from those who had historically been ignored. Community members joined with a coalition of 35 neighborhood, urban environmental, and social justice organizations to form the Chinatown Yard Alliance to fight a proposed warehouse development in favor of a new park. Recognizing the site's significance to the history of Los Angeles, as well as the need for neighborhood green space, the State of California purchased the parcel in 2001. In 2003, the Cornfield Advisory Committee was established to mirror the complexity and diversity of the original Alliance and lead a community-driven planning process that established an overall vision for the new park design.

After this long-fought struggle to transform a railyard brownfield into a lush, green oasis, park users deserve to have their original uses and designs for the park respected, and their public land protected. A project such as this would never be proposed over New York's Central Park, so why should the residents of Northeast LA be treated any differently?

Response GO21-29 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The Draft EIR also considered and analyzed the proposed Project's consistency with land use policies related to environmental justice. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Further, public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger

Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. On the other hand, this commenter mentions New York City's Central Park, which already is served by multiple modes of public transportation including bus and subway.

Comment GO21-30 This infrastructure project now threatening LASHP joins a long history of other projects once considered vital and worthy of sacrificing a State Park. In the early 21st century, high voltage power lines through Anza Borrego Desert State Park to bring solar energy to urban areas, and a toll road through San Onofre State Park to reduce congestion, both raised this question: when, if ever, is it acceptable to sacrifice a state park for a new proposed use? In both of the above instances, alternatives were found that saved the parks AND met the goals of the proposed projects.

Response GO21-30 As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on Los Angeles State Historic Park, including reducing the size and scale of the station to be further in line with the neighborhood characteristics, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

Comment GO21-31 Today, we note that there is indeed another way to meet the goals of reducing emissions and vehicle miles traveled (VMT) for Dodger Games: the Dodger Stadium Express. Electrifying the buses used for the Dodger Express and expanding their number would both meet the goals of this gondola and provide additional opportunities to reduce VMT and emissions elsewhere in the city on non-game days. We therefore support the Transportation Systems Management Alternative, also identified as the Environmentally Superior Alternative, described in the Executive Summary on page 19.

Today LA State Historic Park is well used by residents, neighbors, and visitors from throughout the city, and has also become a vital, climate resilient native landscape supporting local wildlife. We thus urge you to reconsider the DEIR's claim of "not significant" park impacts from the gondola project.

With sincere regards,

Kathleen Johnson
Executive Director
Los Angeles River State Park Partners

Cc: Karen Bass
Eunisses Hernandez
Kevin de Leon

Response GO21-31 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Response S2-4 for additional discussion regarding the impact of the proposed Project on the park.

Comment Letter GO22 – Latino Outdoors

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO22

Comment GO22-1 Dear Mr. Zelmer:

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

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

Response GO22-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO22-2 through GO22-6.

Comment GO22-2 In recent years, Los Angeles State Historic Park (LASHP) and its staff have hosted many LO events including a national NOLS Outdoor Wilderness Training Session and campout, evening campfire programs and several State Parks/Latino Outdoors interpretive hikes, Cradle LA events and community programs. As it is currently proposed, we believe that the LA ART project poses a serious threat to the LASHP, especially if the project's developer and supporters impose their political will to require California State Parks to amend the park's General Plan.

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

> "Who are Angelinos? What is Los Angeles? A noted historian Dr. Leonard Pitt stated, "No other available 32 acres holds as much opportunity to enlighten us about the history and culture of Los Angeles and this region…" The Park site and sits surroundings have a sense of place rooted in a long history of settlement. There are opportunities for discovery and revelation based on the untold stories, some contained in the remnant material culture of the site. The tangible

resources today appear to be few, but we can still hear the whispers of the past resonating in the voices of the present, proclaiming the future of the area."

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

Declaration of Purpose

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

Vision

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

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

It is our belief that the LA ART Project would permanently alter the core values of the Park's General Plan, including its Declaration of Purpose and Vision. Yet the Draft EIR (DEIR) fails to describe this impact. In particular, on page 58 of the DEIR Executive Summary, Land Use and Planning element, LUP-2, the report asserts that the preferred project (ES2 Proposed Project) Environmental Impacts shall create "Significant Impact" on LASHP and the project is in conflict with the current LASHP General Plan. Yet the DEIR suggests that the only "mitigation measure" needed to reduce the project's impact to the park under the category of Potential Environmental Impacts – LAND USE AND PLANNING would be to (LUP-A) "Obtain a Los Angeles State

Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan." The DEIR goes on to assert that by doing so, the project proponents will reduce the project's significant impact to a "Less Than Significant Impact with Mitigation".

Response GO22-2 This comment provides a recitation and characterization of text from the Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit

organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO22-3 So rather than identifying potential detailed and specific impacts on the park (archeological/cultural, environmental, historic, viewshed, visual, etc.) and suggesting mitigations, the DEIR merely notes that the process of a granting a general plan amendment would reduce impacts from significant to less than significant 'with mitigation.' This tactic shifts the burden of identifying all potentially significant impacts (visual, noise, visitor access, pedestrian and parking, acceptable transit options, use of public airspace and others) from the project applicant onto the shoulders of California State Parks staff, the California State Parks and Recreation Commission, and to the public. This is unacceptable and incompatible with California Environmental Quality Act (CEQA) project review process and mitigation, and it sets an indefensible precedent for granting a private developer access and use of State resources entrusted to the State by its residents.

Response GO22-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Accordingly, the Draft EIR complied with CEQA's requirements to analyze the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. As lead agency, Metro has and will continue to comply with all of CEQA's requirements.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be

implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO22-4 As currently proposed, the LA ART project is viewed by our community as just another environmental justice veiled attempt to degrade land that was hard fought and promised to be "The Central Park of LA" for seven generations of Californians and beyond. Recognizing the need for greenspace in LA's urban area, three great environmental warriors dedicated their lives to finding a way to create an open-space oasis in the industrial/commercial wasteland of northeast Los Angeles. The work of the late Robert Garcia (The City Project), Theodore "Ted" Jackson (CA State Parks Deputy Director for Operations) and Ron Shaffer (CA State Parks LA District Superintendent), now all diseased, must not be forgotten – but cherished, protected and preserved.

Response GO22-4 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated

air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment GO22-5 We urge you to reject the DEIR's faulty premise that California State Parks should be expected to mitigate the many obvious significant project impacts by hastily adopting a revised General Plan Amendment that ignores and papers over clear conflicts between the project and park's current General Plan. On behalf of our LO community and current and future park users, we urge you to instruct the project proponent to properly identify, analyze, and mitigate all park impacts as required by law, and not usurp their legal responsibility to provide a clear, thoroughly complete and defendable project DEIR.

Response GO22-5 Refer to Response GO22-3. As lead agency, Metro has and will continue to comply with all of CEQA's requirements.

Comment GO22-6 A failure to do so only reinforces our belief (as well as the majority of local community members) that a privately financed and constructed aerial tram tourist attraction should never be built inside and over Los Angeles State Historic Park.

Respectfully,

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

Response GO22-6 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO22-2 through GO22-5.

Comment Letter GO23 – Old Spanish Trail, Conchita Marusich

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO23

Comment GO23-1 Dear Mr. Zelmer

As the President of the Old Spanish Trail Association (OSTA), I am voicing our concerns about the proposed Gondola project also known as the Metro Aerial Rapid Transit Project. OSTA is an organization dedicated to preserving the Old Spanish Trail (OST), and its historic legacy for present and future generations. The Old Spanish Trail, spanning more than 2,700 miles, crosses over the 6 states of California, Nevada, New Mexico, Arizona, Colorado and Utah. Los Angeles was the end destination for most of the trappers that left New Mexico in search for economic opportunity starting in 1829. The Old Spanish Trail was designated a National Historic Trail in 2002 after unanimously passing both the Senate and the House and was signed into law by President George W. Bush.

Response GO23-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO23-2 through GO23-4.

Comment GO23-2 The area now known as El Pueblo de Los Angeles National Monument has been the historic heart, soul and birthplace of Los Angeles since the early traders arrived over the Trail and eventually brought their families to settle in California. A certified site of the Old Spanish National Historic Trail (OSNHT), this area is crucial to telling the story of early Los Angeles. It has many important historic buildings such as the Avila Adobe, the oldest building in Los Angeles, built in 1818. The Plaza Church, La Iglesia Nuestra Senora La Reina de Los Angeles Roman Catholic Church, built in 1822, was the center of life in the Plaza. El Pueblo de los Angeles National Monument is an important historical gem, critical to Los Angeles history.

And now a group wants to use Disneyland-style gondolas which are wrong for this area. The gondola project threatens to destroy the historic importance of this district. The gondolas will arrive at their last stop at the proposed "Alameda Street" terminal which would be located adjacent to Olvera Street and Union Station. I have included the artist's illustration, which shows how the Gondola project's proposed "Alameda Station" would be detrimental to the integrity and view from the courtyard of the historic Avila Adobe, which in and of itself is a "high potential historic site" of the OSNHT. That proposed Station would be immediately east of the Avila Adobe and its courtyard. The proposed station's enormous bulk and height would overwhelm the view and experience in the Adobe's courtyard, compromising visitors' ability to feel back in the Trail's era and diminishing the historic value of the site. The DEIR fails to adequately convey how this project would affect the experience of the visitor to

El Pueblo. For example, it doesn't show the perspective of the project from the vantage point of someone standing in the courtyard of the Avila Adobe.

In addition, the large, modernistic terminal would be totally different from the Spanish style architecture of the area and could be very disruptive to world-famous and charming Olvera Street that is visited by over 2 million people every year.

Response GO23-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the proposed Project's potential construction and operational impacts to historic resources, including the Los Angeles Plaza Historic District (referred to as El Pueblo de Los Angeles would be less than significant. As discussed on pages 3.05-45 to 3.05-46 of the Draft EIR, the only direct impacts from the proposed Project would be to a non-contributing feature, the Placita de Dolores, which was constructed after the historic district was designated, and accordingly impacts would be less than significant. With respect to indirect impacts, while the proposed Project's Alameda Station would add another non-original element to the broader setting, mere visibility of a new building, structure, or feature from certain vantage points alone would not result in an indirect impact. The proposed Project would introduce a visible new feature to the historic district's setting, but Alameda Station, with the exception of the vertical circulation and associated alterations to the non-contributing plaza space, would be located outside of the historical resource's boundary, and contributing buildings would retain their visual and physical relationships with one another. As discussed in Section 3.05, construction and operational impacts associated with the proposed Project would not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts would be less than significant. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR, and Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for existing and simulation views looking east at the proposed Project from the courtyard of the Avila Adobe.

Comment GO23-3 Why would Los Angeles want to risk this important business and tourist area for a visually intrusive, potentially dangerous gondola system in earthquake prone Los Angeles? The severe freeway overpass earthquake damage in Sylmar in the 1960's illustrates what earthquake damage can occur in Los Angeles.

Response GO23-3 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet

applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems operate safely in seismically active areas.

Comment GO23-4 There are also potentially many undiscovered archeological and historical sites, including the Zanja Madre, that could be ruined by the excavation for the gondola stations along the route from Dodger Stadium but particularly in the El Pueblo area. Once these artifacts are destroyed, they cannot be brought back and would be an historical loss for Los Angeles.

Response GO23-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources, including the Zanja Madre, would be either less than significant or reduced to less than significant with mitigation.

As noted on page 3.5-58, there is no overlap between the known locations of the Zanja Madre within El Pueblo and the proposed ground disturbance for the proposed Alameda Station. The segment of the Zanja Madre, Resource 19-000887, was capped in 1978 for preservation, is currently denoted by decorative pavement, and will not be impacted by the proposed Project. As noted on pages 3.5-58 and -59, the proposed Project has potential to significantly impact buried, unrecorded material in other portions of Resource 19-000887 and, as such, mitigation measures related to archaeological testing and recovery have been proposed that will reduce impacts to the resource to less than significant. Specifically, Mitigation Measure CUL-C notes that although the proposed Project is designed to not impact the portion of the Zanja Madre within Resource 19-000887, but nevertheless requires a testing plan to be prepared for portions of the site that will be impacted outside of the known Zanja location.

Comment GO23-5 As I said in the opening of this letter, the Old Spanish Trail Association is dedicated to preserving the OST wherever there are threats to its historic and cultural legacy and we are very concerned that the gondola project could cause irreversible harm to the OST in downtown Los Angeles, El Pueblo de Los Angeles National Monument, Olvera Street and the surrounding area.

Sincerely,

Conchita Marusich
President, Old Spanish Trail Association

Response GO23-5 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO23-2 through GO23-4.

Comment Letter GO24 – Jon Christensen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO24

Comment GO24-1 Dear Mr. Zelmer:

I'm writing to express my grave concern about the inadequacy of the Draft Environmental Impact Report for the Los Angeles Aerial Rapid Transit project. I teach and do research at UCLA on environmental equity and access, green gentrification, and equitable community development strategies to prevent displacement and enable communities to thrive in place with new investments in green infrastructure and parks.

My concerns about the DEIR arise from the lack of adequate analysis in four crucial areas:

Response GO24-1 This comment provides a general introduction to the comments raised in this letter. Responses to comments contained in this letter are provided below in Responses GO24-2 through GO24-20.

Comment GO24-2 1) The piecemealing of the whole project:

There is documented evidence that Frank McCourt has plans to develop an entertainment/hotel/retail complex on the parking lots at Dodger Stadium if he can build another form of transportation to bring fans to games. The DEIR only considers the new form of transportation — an aerial gondola. It does not consider the foreseeable end result: the ensuing development on the parking lots. Thus, it does not analyze the whole project. This is a fundamental violation of CEQA. While the McCourt group and its representatives have denied that they have such plans, the plans are documented in a court settlement that they have attempted to keep shielded from public view. I am attaching an investigative research report that I wrote with a student researcher that documents McCourt's plans for developing the parking lots at Dodger Stadium. This report should be considered part of my comments.

Response GO24-2 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. As discussed in Topical Response G, the adoption of the CC&Rs

over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. Actions from over a decade ago, and speculative comments attempting to assign a motive to such actions, do not evidence a firm and specific commitment to develop the property surrounding Dodger Stadium. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit "foreseeable" development from its analysis, and CEQA expressly discourages such speculation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response GO24-11 for a response to the "report" attached to this letter.

Comment GO24-3 2) The inadequate analysis of the aerial gondola's impact on traffic, pollution, and greenhouse gas emissions, and alternative transportation solutions:

The McCourt group and its representatives have made numerous and varying claims about the project's impact on traffic, pollution, and greenhouse gas emissions. The DEIR's analysis of these claims is woefully inadequate. The ridership assumptions found in Appendix N are deeply flawed. The modeling and conclusions on travel data were gathered from cell phone for only two zip codes. One zip code is very near Dodger Stadium. The other is located approximately 90 minutes via public transit from the stadium. This sample cannot be considered representative of the population that would or would not use the proposed gondola and the sample size is too small to be statistically significant. Thus, the DEIR analysis is incomplete and inaccurate.

Response GO24-3 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning

services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. The comment alleges that the ridership model's travel data were gathered from cell phone data for two zip codes. This is not accurate. As shown on Figure 1 and Table 1 on pages 3 and 4 of Appendix N, Ridership Model Development, the model used Dodger ticket purchases and GIS ESRI's "Routable Network" data by zip code for all zip codes in the Southern California region from which tickets were purchased. The misperception that only two zip codes were used could arise from two "examples" included in Appendix N to describe how the model produces different transit mode share results for different zip codes based on the travel time and cost characteristics associated with each individual zip code. As examples, the two sample zip codes presented in Table N were not intended to represent the full set of calculations from the model. The model produced custom mode share results for each of hundreds of zip codes in the ticket purchase database. Furthermore, as discussed on page 3.17-28, in Section 3.17, existing mobile source data collected and aggregated by Teralytics and consisting of approximately 2.1 million trip samples was used to calculate average trip length for vehicles traveling to and from Dodger Stadium on game days for zip codes within a 50-mile radius of Dodger Stadium. The sample sizes used in the analysis were robust. The Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO24-4 A simulation done by the UCLA Mobility Lab, attached here, uses actual data of current behavior of people using various forms of transit in the Los Angeles region, and uses "discrete choice" theory (which won a Nobel Prize) to simulate the choices and behaviors of those people when the proposed gondola project is added to the network of available transportation choices to get to Dodger Stadium for baseball games. This simulation is far more statistically representative because it is based on actual transportation choice data and provides a far more realistic assessment of projected ridership. The report on this simulation should be considered part of my comments. It shows that traffic and therefore greenhouse gas emissions would not change significantly with the aerial gondola in service. The EIR should include a much more robust analysis of traffic and greenhouse gas emissions, including effects from the foreseeable development described above.

Response GO24-4 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
Jiaqi Ma
Director, UCLA Mobility Lab
Faculty Associate Director, UCLA Institute of Transportation Studies

Refer to Response GO24-3 for a discussion of how the ridership model, assumptions, and estimates in the Draft EIR were prepared by constructing a detailed model utilizing accepted and tested data from a variety of sources as described in Appendix N, Transportation Appendices, of the Draft EIR, as well as peer reviewed by a respected international consulting firm and found to be appropriate and reasonable. Any differences between the findings in the Mobility Lab Study and the Draft EIR are therefore to be expected and are explainable. Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or inappropriate for use.

Comment GO24-5 In the DEIR, LA ART ridership is assumed to ride the gondola both to and from games and events. But there is no proof, nor is there any discussion within the DEIR, that this assumption is correct. As the UCLA study shows, and consistent with Los Angeles County Transportation Commission's 1990 analysis of an aerial tram system, many people would be required to wait from 1 to 2 hours following games and events to return via the proposed gondola. Rather than waiting, many would instead either return via the Dodger Stadium Express or via Lyft or Uber, options that didn't even exist in 1990 when LACTC studied the idea. The assumption that all gondola riders would use it in both directions is entirely speculative and unsupported, and therefore throws off not only the DEIR's ridership conclusions, but also its conclusions regarding energy usage and greenhouse gas emissions. The DEIR therefore fails as an informational document for being inaccurate and incomplete.

Response GO24-5 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the underlying factors that would influence post-game/event travel conditions and ridership which are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. . Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period

could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service. Moreover, based on 2019 season data, there is an approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game. The proposed Project model assumed this same reduction for the post-game ridership estimates for the proposed Project. To be conservative, the full reduction of post-game ridership is assumed to shift to TNCs, which are estimated to generate more VMT than private vehicle trips due to the VMT generated by the driver traveling to the pick-up location at Dodger Stadium. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. As shown in Table 1 of the 1990 Dodger Stadium Transit Access Study (1990 study) referenced in the comment,[72] the gondola technology evaluated in that study was a reversible tramway system consisting of two 125-passenger cars, similar to the Portland Aerial Tram in Portland, Oregon and the Roosevelt Island Tramway in New York, New York. An aerial tram system typically has two cabins that shuttle back and forth between two end terminals. The proposed Project is a detachable gondola system. An aerial gondola system includes multiple cabins that travel on a continuously circulating cable, which allows for an overall higher system capacity and ability to move more people per hour in each direction than an aerial tram. Furthermore, the proposed Project would be a modern 3S system with the capacity to move approximately 5,000 people per hour per direction with a travel time from LAUS to Dodger Stadium of seven minutes, far greater than the 2,800 persons per hour capacity estimated in the 1990 Study for the two-car reversible tramway system. As such, the two systems are not comparable, and findings in the 1990 Study comparing the tramway system to other modes as analyzed in that 33-year-old study are not relevant to the current proposed Project. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.3, Air Quality, Section 3.6, Energy, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix H, Energy Technical Report, Appendix J,

[72] Gruen Associates. 1990. Dodger Stadium Transit Access Study. Available at: https://libraryarchives.metro.net/dpgtl/lactc/dodger_stadium_access_study.pdf. Accessed August 2023.

Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO24-6 Finally, I am attaching an analysis that I conducted of the energy efficiency of the proposed aerial gondola compared to alternatives, the Dodger Stadium Express and individual electric vehicles, that shows that the aerial gondola is far less energy efficient per passenger trip than these alternatives. The DEIR fails to adequately consider feasible alternatives and conduct such a comparison and is therefore incomplete.

Response GO24-6 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, including the No Project Alternative, Spring Street Alignment Alternative, and the Transportation Systems Management (TSM) Alternative. For each alternative carried forward, the alternative was assessed against applicable environmental impact areas and the Project Objectives. Discussion of energy consumption and efficiency was discussed on Page 4-66 for each alternative, including the Transportation Systems Management Alternative, which includes a potential expansion of the Dodger Stadium Express. Refer to Response GO24-20 for further detail as to why the efficiency analysis alluded to in this comment is flawed. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. The Draft EIR considered a range of reasonable alternatives to the proposed Project in compliance with CEQA and the CEQA Guidelines. The Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO24-7 3) The inadequate and inaccurate analysis of the project's impact on Los Angeles State Historic Park:

The DEIR claims that the proposed gondola will not have a significant impact on the park. This is preposterous. Anyone who looks at the plans for the proposed station at the entrance to the park and the path of the gondola over the park can plainly see that it will fundamentally change the character of the historic park and the experiences of park visitors. The station will loom over and dominate the southwestern portion of the park and dramatically change the views of the park from the southwest as well as the views inside the park looking west, both protected by the park's 2005 general plan and EIR. While the DEIR documents some of these views, it does not adequately consider the impact on other views of the park from other locations, such as from Chinatown, Radio Hill Gardens, Elysian Park and other places with iconic views of the park.

Response GO24-7 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. The Draft EIR addressed aesthetic impacts in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment of the Draft EIR. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included 30 Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR

concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. The Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment GO24-8 The gondola cars will pass over a substantial portion of the park as they travel through the northwest quadrant of the park, passing just 26 feet over the ground as they traverse a popular knoll in the park, in other words just 20 feet over the head of someone who is 6-feet tall. The DEIR does not adequately analyze these impacts and is therefore incomplete and inaccurate. It also does not adequately analyze the impacts of the taking of land and air space from this public park, which would be required for the gondola to be built.

Response GO24-8 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom

of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. The Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment GO24-9 Furthermore, the DEIR shifts the burden of analyzing these impacts to the California State Park and Recreation Commission, which must complete a general plan amendment should it decide to allow the proposed gondola to take land and air space from the park. This is a fundamental violation of CEQA. The California State Park and Recreation Commission should not have to perform their own environmental analysis of the impact of the proposed gondola. It should be included in this DEIR.

Response GO24-9 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Topical Response D, Metro Is the

Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of Metro's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Accordingly, State Parks engaged in the consultation process as a responsible agency to ensure that the scope and content of the environmental information that it needs to have included in the EIR for its actions related to the proposed Project pursuant to CEQA section 21080.4(b) and CEQA Guidelines section 15104. Therefore, should the EIR be certified, State Parks will then consider this Final EIR, but retains its own independent judgment whether to approve the action before it pursuant to CEQA Guidelines section 15096.

Comment GO24-10 4) The failure to analyze the impact of the project on gentrification and displacement in the surrounding neighborhoods:

It is well-known that gentrification and displacement can result from green infrastructure projects, including transportation projects. The UCLA Urban Displacement Project has documented these effects around other Metro projects in Los Angeles. This is a well-recognized environmental justice issue at the local, state, and national level. It is inappropriate and unconscionable for a DEIR to fail to analyze these foreseeable impacts in 2022, especially in the disadvantaged communities where the aerial gondola stations are proposed to be located. This DEIR is incomplete and inaccurate in this regard as well.

Given these fundamental flaws, this DEIR should not proceed to the final EIR stage but should instead be sent back to the drawing board so that the public has an accurate and complete understanding of the impacts of the project. Absent that, the public has been deprived of the right to understand and comment on the whole project. Metro would also be justified in scrapping this ill-advised project entirely.

Response GO24-10 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion how the proposed Project, as a transit project, will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for a discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road

vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Further, the Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and the proposed Project is consistent with General Plan policies related to environmental justice, including by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements, and by ensuring quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. No recirculation of the Draft EIR is required pursuant to Public Resources Code section 21092.1 or CEQA Guidelines section 15088.5 because this comment does not raise any significant new information regarding a substantial adverse environmental effect.

Comment GO24-11 Investigative Report

Frank McCourt's Past and Future Schemes for Chavez Ravine

Frank McCourt shows then-L.A. Mayor Antonio Villaraigosa a model of proposed developments in the parking lots surrounding Dodger Stadium at a press conference in 2008. Newly uncovered court documents reveal that McCourt still has permission from the current owners of the Dodgers and plans to develop a massive retail, entertainment, and hotel complex at Chavez Ravine. And a gondola he has proposed from Union Station to the stadium would pave the way for the development Brian Vander Brug, *Los Angeles Times*, April 25, 2008, via Getty Images.

By Leo Hecht and Jon Christensen, August 9, 2022[1]

LOS ANGELES — Former Dodgers owner Frank McCourt is proposing to build a gondola from Union Station to Dodger Stadium, where he still owns a 50% share in 260 acres of land surrounding the stadium. That land, known as Chavez Ravine, represents a huge financial opportunity for the owners of the property if development ever occurs there.[2] Currently, it is used for surface parking, and the McCourt Global company proposing the gondola — Los Angeles Aerial Rapid Transit — makes no mention of future development plans. But McCourt has long had plans for an ambitious retail and entertainment complex around the stadium. Those plans are evident in McCourt's "Next 50" plan, which was unveiled when he owned the Dodgers, and in court documents that he tried to hide from public scrutiny during the bankruptcy proceedings that forced him to sell the team. McCourt failed to secure funding for "Next 50," but the agreements revealed in the bankruptcy proceeding are still in force and tell a very different story about the relationship between the proposed gondola, McCourt's plans to develop the parking lots around Dodger Stadium, and the future of Chavez Ravine.

This report examines McCourt's history with the Dodgers, the stadium, and his documented intentions to develop the parking lots in light of his current proposal to build a gondola from Union Station to Dodger Stadium. McCourt Global's denial of any current intention to develop the parking lots are belied by McCourt's previous plans, his 50% ownership of the land, and the fact that the gondola makes little or no sense without a major development at Dodger Stadium, which a gondola could facilitate through provisions in the court document that McCourt tried to keep secret. There are only 81 home games in the regular baseball season. And even adding a maximum of 12 post-season games, a couple of exhibition games, a maximum of four special events a month permitted under the Conditional Use Permit issued by the City of Los Angeles for the stadium, and the Los Angeles Marathon, at most the gondola is likely to be used at or near capacity on only 144 days per year.[3] Unless, that is, the Dodger Stadium parking lots are developed as an entertainment, retail, and hospitality district like L.A. Live as Frank McCourt has long envisioned.

In 2004, McCourt bought the Los Angeles Dodgers from Newscorp for $430 million. The purchase was financed primarily with loans, with over a third of the purchase price lent directly from Newscorp.[4] At the time of McCourt's purchase, no specific plans for development of the parking lots surrounding the stadium were made public. However, on April 25, 2008, McCourt unveiled a sprawling development plan for the stadium itself and the surrounding lots. Marketed as the "Next 50" plan, the proposed development was slated to include a Dodger museum, a Dodger retail store, office space, and two new parking structures. In addition, the project was advertised as a green initiative, including the addition of 2,000 trees in the area around the stadium.[5] The development was expected to cost $500 million, more than McCourt's purchase price for the team.

The "Next 50" plan would have turned the stadium into a retail and entertainment venue to attract customers outside of game times, expanding the use of Dodger Stadium beyond baseball.[6] The William Morris Agency, a Los Angeles talent agency, partnered with the Dodgers to obtain branding deals with companies in an attempt to fund the project by naming parts of the new development after corporate sponsors.[7] Photographs of McCourt presenting a scale model of development plans at a press conference beside then Mayor of Los Angeles Antonio Villaraigosa show the proposed changes, including large, terraced plazas lined with trees and new buildings outside of the stadium. McCourt's planned development was designed to make use of the parking lots surrounding the stadium to increase the economic productivity of the land and turn Chavez Ravine into a year-round destination.

As part of his plans for the "Next 50" development, McCourt discussed a desire to connect Dodger Stadium to public transit, saying he "hoped local leaders would 'tweak and adjust subway lines' to add a Dodger Stadium stop and provide 'bus access in the interim.'" Then city council member Ed Reyes further endorsed connecting the development to new public transit lines, saying that the "renovation 'hopefully can

stimulate a whole new transit system that gets us in and out of this great place.'"[8] In developing plans for his additions to Dodger Stadium and the surrounding land, McCourt clearly identified expanded public transit options as increasing potential visitors as well as revenue in new retail and entertainment destinations.

Under McCourt's ownership the Dodgers fell deep into debt, ultimately filing for bankruptcy on June 27, 2011. In addition to bankruptcy court conflicts with Major League Baseball, McCourt was ordered to pay $150 million in a divorce settlement, and defended a suit by a San Francisco Giants fan who was badly beaten in the Dodger Stadium parking lot.[9] The "Next 50" development never materialized, as McCourt failed to secure funding.

McCourt was very resistant to selling the Dodgers, and only agreed to a sale in November 2011 after a series of long court battles. After several rounds of negotiations, a group led by Magic Johnson and financed by Guggenheim Partners won the bid to purchase the Dodgers for $2 billion. As part of the deal, Guggenheim Partners entered into a venture with a McCourt entity to jointly own the stadium parking lots.[10]

The terms of the parking lot sale and any potential future development of the land around the stadium was filed under court seal as part of the supplement to the Dodger's chapter 11 bankruptcy plan on April 6, 2012. Of nine sections totaling 139 pages, the exhibit titled the "Declaration of Covenants, Conditions, Restrictions, and Easements for Chavez Ravine," consisting of 93 pages of terms and agreements relating to the current usage and future development of Chavez Ravine, is the only piece of the document not available in public court records.[11] After objecting to the Dodger's attempt to block public viewing of the land use plans, the Los Angeles Times was able to obtain the document in 2012.[12] The exhibit was subsequently recorded by the Los Angeles County Recorder's Office, which is where it was obtained for this report.

The exhibit shows that Guggenheim Partners pays $14 million a year to the McCourt entity Blue Landco LLC to rent the stadium parking lots. The document also details possible future developments that "may include, but are not limited to (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining, and entertainment facilities."[13] The document includes a provision stating that Guggenheim Partners agrees "to cooperate with Landco, and to take all steps reasonably requested by Landco, in connection with the general plan of improvement and development of the Landco Parcels," and "not to oppose, or to interfere in any fashion (including, without limitation, by speaking out at public hearings) with any efforts by Landco to complete development of the Landco Parcels."[14] This provision effectively grants Landco the sole discretion to develop the stadium parking lot lands.

Although McCourt and Guggenheim Partners claimed at the time of the sale that they did not have plans for development in the immediate future, McCourt's attorney said that the document outlining potential plans was created to keep possibilities for development open. The document includes an agreement with Guggenheim Partners for a 99-year lease of the land with the Landco LLC half-owned by McCourt. The agreement states that the parking lots contain 19,000 parking spaces, and that any reduction of the number of parking spaces below 16,500 must be approved by Major League Baseball and the City of Los Angeles.[15]

An additional section of the exhibit, however, provides a workaround for this provision that is especially significant in light of McCourt's proposed gondola. It states that "in connection to any Mass Transportation…Landco shall have the right to provide less than the 16,500 Required Parking Spaces."[16] This would allow for developments in the parking lots that could significantly reduce the number of parking spaces if the developments were completed after or concurrent with the addition of a mass transit connection to Dodger Stadium. Under this agreement, construction of a gondola to the stadium from Union Station could enable McCourt's vision for additional development in Chavez Ravine to be realized.

McCourt Global's website trumpeted its ownership interest in the 260-acre Chavez Ravine land as a "current real estate project" through at least October 2021, though that statement appears to have been removed from the website once the company began facing significant opposition to its proposed gondola project.[17] McCourt's proposal for a gondola from Union Station to land he co-owns at Dodger Stadium could be a necessary first step to allow development there.

On April 26, 2018, Aerial Rapid Transit Technologies LLC submitted an unsolicited proposal to Los Angeles County Metropolitan Transportation Authority ("Metro") for an aerial gondola from Union Station to Dodger Stadium that it calls Los Angeles Aerial Rapid Transit or "LA ART." LA ART was founded by Drew McCourt, Frank McCourt's son. The company claims that the estimated $125 million project will be privately funded by Frank McCourt's investment firm and others.

According to LA ART, each gondola cabin will hold 30 to 40 people and the system will be able to move up to 5,000 people per hour to or from the stadium. LA ART claims the gondola will take 3,000 cars off of neighborhood streets and reduce traffic on the 110 freeway before and after Dodger games. Current plans show gondola cars suspended from cables 150 to 175 feet above the ground from Union Station to Dodger Stadium with an intermediate station at Los Angeles State Historic Park adjacent to Chinatown.[18]

The Los Angeles Times noted that even though the project director Martha Welborne claimed no future development is planned in 2018, "lenders might be more receptive to finance a gondola that goes to Dodger Stadium 365 days a year — rather than just

on 81 home-game dates."[19] At that time McCourt Global still listed the parking lots as a "current real estate project."[20]

Despite LA ART's insistence that the gondola is not a precursor to future development, the gondola project would generate significantly more revenue for McCourt if it could deliver consumers to a commercial development with restaurants, retail, entertainment, and hospitality venues on the approximately 220 days of the year when the stadium does not host home games, exhibition games, post-season games, or special events. And McCourt's share of profit from the real estate development would vastly exceed any profit from a gondola.

The "Declaration of Covenants, Conditions, Restrictions, and Easements for Chavez Ravine" that McCourt secured and tried to hide from the public in the Dodgers' bankruptcy case shows the proposed gondola is not the end game at Dodger Stadium, but a means to yet another end.

References:

"FAQs" LA ART, http://www.laart.la/faqs/ "Benefits" LA ART, https://www.laart.la/benefits/

"Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 4.1, Los Angeles County Recorder's Office, Document #20120642991

"Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 5.1.2, Los Angeles County Recorder's Office, Document #20120642991

"Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 14.3, Los Angeles County Recorder's Office, Document #20120642991

Hernandez, Dylan & Shaikin, Bill. "Stadium makeover is unveiled" Los Angeles Times, 25 Apr. 2008

Nelson, Laura J. & Shaikin, Bill. "A gondola from Union Station to Dodger Stadium? It could happen by 2022, Mayor Garcetti says" Los Angeles Times, 26 Apr. 2018

"Our Company" McCourt Global, http://web.archive.org/web/20210724150915/https://www.mccourt.com/mccourt-global-overview Accessed via The Wayback Machine

"Plan Supplement" for Case No. 11-12010 (KG) in the Delaware Bankruptcy Court, filed 6 Apr. 2012

Shaikin, Bill. "Dodgers' owners to pay $14 million a year to rent parking lots from McCourt entity" Los Angeles Times, 4 May 2012

Shaikin, Bill. “Few new details in Dodgers’ sale court documents” Los Angeles Times, 6 Apr. 2012

Shaikin, Bill. “Frank McCourt appears close to agreeing he’ll sell Dodgers” Los Angeles Times, 31 Oct. 2011

Shaikin, Bill. “L.A. Times objects to Dodgers’ bid to seal conditions of land use” Los Angeles Times, 11 Apr. 2012

Smith, Dakota. “New Dodgers Stadium Reveal: We Got Trees!” Curbed LA, 24 Apr. 2008

Vander Brug, Brian. Photograph of Frank McCourt and Antonio Villaraigosa, via Getty Images, 25 Apr. 2008

Vincent, Roger & Bensinger, Ken. “Developing Chavez Ravine is likely in play for new Dodgers owner” Los Angeles Times, 16 Apr. 2012

Vincent, Roger. “Naming rights could turn Dodger diamond into gold” Los Angeles Times, 14 Oct. 2008

Wharton, David. “Dodgers’ New Owner Steps Up to the Plate” Los Angeles Times, 30 Jan 2004

Footnote 1: Leo Hecht is an independent, investigative researcher and environmental policy analysis and planning student at UC Davis. Jon Christensen is an adjunct assistant professor in the Institute of the Environment and Sustainability at UCLA.

Footnote 2: Vincent, Roger & Bensinger, Ken. “Developing Chavez Ravine is likely in play for new Dodgers owner” Los Angeles Times, 16 Apr. 2012.

Footnote 3: The McCourt Global subsidiary proposing the gondola, Los Angeles Aerial Rapid Transit (LA ART), claims that it will transport up to 5,000 passengers per hour in each direction and remove 3,000 car trips from neighborhood streets before and after Dodger games. See: https://www.laart.la/benefits/, accessed on 17 July 2022.

Footnote 4: Wharton, David. “Dodgers’ New Owner Steps Up to the Plate” Los Angeles Times, 30 Jan 2004.

Footnote 5: Smith, Dakota. “New Dodgers Stadium Reveal: We Got Trees!” Curbed LA, 24 Apr. 2008.

Footnote 6: Hernandez, Dylan & Shaikin, Bill. “Stadium makeover is unveiled” Los Angeles Times, 25 Apr. 2008.

Footnote 7: Vincent, Roger. “Naming rights could turn Dodger diamond into gold” Los Angeles Times, 14 Oct. 2008.

Footnote 8: Hernandez, Dylan & Shaikin, Bill. “Stadium makeover is unveiled”

Footnote 9: Shaikin, Bill. "Frank McCourt appears close to agreeing he'll sell Dodgers" Los Angeles Times, 31 Oct. 2011.

Footnote 10: Shaikin, Bill. "Few new details in Dodgers' sale court documents" Los Angeles Times, 6 Apr. 2012.

Footnote 11: "Plan Supplement" for Case No. 11-12010 (KG) in the Delaware Bankruptcy Court, filed 6 Apr. 2012.

Footnote 12: Shaikin, Bill. "L.A. Times objects to Dodgers' bid to seal conditions of land use" Los Angeles Times, 11 Apr. 2012.

Footnote 13: "Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 4.1, Los Angeles County Recorder's Office, Document #20120642991.

Footnote 14: "Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 14.3, Los Angeles County Recorder's Office, Document #20120642991.

Footnote 15: Shaikin, Bill. "Dodgers' owners to pay $14 million a year to rent parking lots from McCourt entity" Los Angeles Times, 4 May 2012.

Footnote 16: "Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine" Section 5.1.2, Los Angeles County Recorder's Office, Document #20120642991.

Footnote 17: "Our Company" McCourt Global, http://web.archive.org/web/20210724150915/https://www.mccourt.com/mccourt-global-overview Accessed via The Wayback Machine.

Footnote 18: "FAQs" LA ART, http://www.laart.la/faqs/

Footnote 19: Nelson, Laura J. & Shaikin, Bill. "A gondola from Union Station to Dodger Stadium? It could happen by 2022, Mayor Garcetti says" Los Angeles Times, 26 Apr. 2018.

Footnote 20: See footnote 17.

Response GO24-11 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Mere statements on a website are not evidence that such development is currently proposed, nor are they sufficiently firm or committed to such that environmental analysis is required. No improper segmentation has occurred and the independent utility of the proposed

aerial gondola project – the first permanent transit connection to one of the region's most visited venues – has been well established. In addition, refer to Topical Response G for a discussion of how the proposed Project addresses the need for a permanent transit connection to Dodger Stadium for Dodger games and special events at the Dodger Stadium property, and how the Dodger Stadium property is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated by commenters. Further, the adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. In addition, refer to Topical Response G for a discussion of how the "Next 50" project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment GO24-12 UCLA Mobility Lab

Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions

October 24, 2022

University of California Los Angeles

Executive Summary

Los Angeles Aerial Rapid Transit (LA ART), a subsidiary of former Dodgers owner Frank McCourt's company McCourt Global, wants to build an aerial gondola to take people

from Union Station to Dodger Stadium. Promoters of the gondola claim that it will take 3,000 polluting cars off neighborhood streets and the 110 freeway before and after Dodger games, leading to a net reduction in greenhouse gas emissions.

Transportation researchers from the University of California, Los Angeles (UCLA) examined these claims using a state-of-the-art transportation simulation model and found that the gondola could reduce traffic on major roads around Dodger Stadium on the night of a sold-out game, but the impact would likely be very limited. They found that the gondola likely would take only around 608 cars off the road. The gondola is thus unlikely to significantly reduce greenhouse gas emissions and traffic overall.

Response GO24-12 Refer to Response ML-1 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-13 Methodology

The UCLA researchers – led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering – used the "LA Sim" model they created based on activity-based travel demand and agent-based simulation models. The model is grounded in the theory of "discrete choice," for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network.

The researchers caution that this simulation only models the probable use of the gondola for a sold-out night game and further research could reveal different scenarios for a day game or double-header, for example. But the research does model the most likely scenario for fans to choose the gondola – when traffic around the stadium is likely to be most heavy. Around 85% of baseball games played at Dodger Stadium are night games, starting at 7:10pm.

Response GO24-13 Refer to Response ML-2 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-14

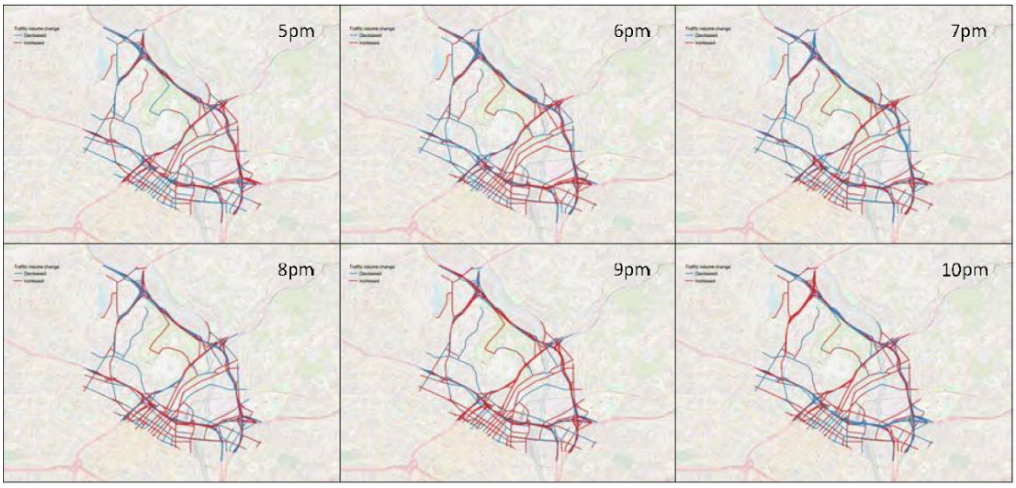

Figure 1: Traffic simulation results by the hour

Findings

- Contrary to claims from LA ART, researchers found that the gondola would not significantly reduce traffic around Dodger Stadium. Results showed the gondola would likely slightly reduce traffic on some roads around the stadium for a sold-out night game and increase traffic on others, leading to little reduction in greenhouse gas emissions. The red lines in Figure 1 above indicate road segments that have a higher traffic volume after the proposed gondola is added to the traffic simulation. The blue lines indicate a decrease in traffic volume. According to the simulation, the total traffic volume would likely be reduced by around 0.9% (less than 1%) on the roads surrounding the stadium if the proposed gondola is built.

Response GO24-14 Refer to Response ML-3 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-15 It's unlikely the gondola would contribute to a significant net decrease in greenhouse gas emissions. Approximately 608 cars would be taken off the road, not nearly close to the 3,000 LA ART claims. Most of the people who choose the gondola in the simulation – 4,470 – board the gondola at Union Station, with another 220 passengers boarding at a station proposed to be located at Los Angeles State Historic Park near Chinatown. With only 4,690 people taking the gondola in total and of those 2,500 estimated to be regular users of the Dodger Stadium Express clean energy buses there would only be 2,190 new people taking public transportation to the game using the gondola. The average car parking at the stadium carries 3.6 people, which means that the approximate number of cars taken off the road would be around 608. The simulation only models the number of passengers connecting the gondola via public transportation, on foot or by bike. It does not model people who would drive to Union Station or Chinatown to take the gondola. However, people who drive to those stations to take the gondola would not contribute to a net reduction in traffic or greenhouse gas emissions.

Response GO24-15 Refer to Response ML-4 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-16 The gondola would carry fewer passengers than LA ART has claimed. LA ART originally claimed that the gondola could carry up to 5,000 passengers per hour on game days. Researchers found that the gondola is likely to carry fewer than a total of 5,000 passengers to Dodger Stadium – 4,690 according to the simulation – even when the service is provided free with a game ticket for a sold-out night game like the playoffs. In a recent parking study, LA ART revised their claim, estimating that 6,000 would ride the gondola to games by 2026, with 4,350 arriving to the gondola via public transportation. The project's Draft Environmental Impact Report contains the same estimate, which corroborates the UCLA estimate of ridership if the gondola were in operation today.

Response GO24-16 Refer to Response ML-5 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-17 Fewer people would take the gondola after the game – resulting in more traffic and emissions. In the simulation, some fans – around 2,500 – seem to switch from the free Dodger Stadium Express buses to the gondola on the way from Union Station to a sold-out game, reducing the use of that service by close to half of the passengers it has carried to playoff games in the past. But about half of those passengers – more than 1,000 – seem to switch back to the Dodger Stadium Express on the way home, perhaps to avoid having to wait for a gondola car. Only 1,380 fans take the gondola on the way home in the simulation. This suggests that fans are unlikely to wait in line for the gondola after the game, instead taking the Dodger Stadium Express or perhaps opting for a ride-share, which would increase traffic and greenhouse gas emissions after the game.

Response GO24-17 Refer to Response ML-6 in Topical Response O, UCLA Mobility Lab Study.

Comment GO24-18 Few people would use the gondola as a form of transportation other than to get to or from games. The simulated use of the gondola during the daytime before the game suggests that very few people would use it as a form of transportation outside of getting to and from games: in the simulation, only 60 people – around one gondola carload – traveled to Dodger Stadium during the day, and only 140 passengers traveled from the stadium to Chinatown or Union Station during the day.

Response GO24-18 Refer to Response ML-7 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-19 The model produced very similar results at different costs for a gondola trip. LA ART previously announced that a gondola trip would cost $15. Later, they announced that game ticket holders could ride the gondola for free. They have also said that local rides could be purchased for a standard Metro fare. The researchers modeled two scenarios: 1) $10 for residents and free for game ticket holders, and 2) free to the public, and found very little difference in the results, indicating that residents are more likely sensitive to travel time rather than cost. One key factor is that the service

area of the gondola is limited and may not attract residents to choose it for daily travel.

Response GO24-19 Refer to Response ML-8 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-20 About the Researchers

Dr. He is an Assistant Research Scientist at the UCLA Mobility Lab. He has extensive experience in big data analytics, transportation system analysis, and transportation policy evaluations. In the scope of cyber-physical systems, his research enables interactions between the physical infrastructure and virtual cyber systems by adopting data-driven techniques to support long-term urban system planning, management, and decision-making.

Dr. Ma is an Associate Professor in the UCLA Samueli School of Engineering and Associate Director of UCLA Institute of Transportation Studies. He has led and managed many research projects funded by U.S. DOT, NSF, state DOTs, and other federal/state/local programs covering areas of smart transportation systems, such as vehicle-highway automation, Intelligent Transportation Systems (UTS), connected vehicles, shared mobility, and large-scale smart system modeling and simulation, and artificial intelligence and advanced computing applications in transportation. He is an Associate Editor of the IEEE Transactions on Intelligent Vehicles and IEEE Open Journal of Intelligent Transportation Systems and Journal of Intelligent Transportation Systems. He is Member of the Transportation Research Board (TRB) Standing Committee on Vehicle-Highway Automation, Member of TRB Standing Committee on Artificial Intelligence and Advanced Computing Applications, Member of American Society of Civil Engineers (ASCE) Connected & Autonomous Vehicles Impacts Committee, Co-Chair of the IEEE ITS Society Technical Committee on Smart Mobility and Transportation 5.0.

Response GO24-20 Refer to Response ML-9 in Topical Response O, Response to UCLA Mobility Lab Study.

Comment GO24-21 LA ART Gondola Energy Use Analysis

The UCLA Mobility Lab's traffic study estimates that 4,690 passengers would ride the gondola to a sold-out night game at Dodger Stadium and 1,380 would ride the gondola on their way home. These figures are very close to the figures in the DEIR and LA ART parking study. That's 6,084 passenger miles since the gondola is 1.2 miles long.

The DEIR states that the gondola running at full capacity uses 2.5 mega-watts per hour. If we conservatively estimate that the gondola has to run at full power for one hour before the game to get passengers to the stadium and one hour to get them back, that's 5 mega-watt hours (MWh). Divided by 6,084 passenger miles that is 0.822 kilowatt hours (kWh) per passenger mile, and 1.184 kWh per passenger trip. If the gondola has to run longer than two hours to move the same number of projected passengers, those energy use figures will go up and the gondola's energy efficiency

per passenger mile will go down proportionally. LA ART estimates the gondola will run daily from 6am to 12am.

Each Dodger Stadium Express bus can carry 55 passengers. The average electric bus uses 2.1 kWh per mile. That is 0.038 kWh per passenger mile and 0.061 per passenger trip on the 1.6-mile trip. The Dodger Stadium Express is approximately 19 times more efficient than the gondola.

The average EV uses 0.346 kWh per mile, and the average vehicle carries 3.6 people to Dodger Stadium, that is 0.096 kWH per passenger mile, and 0.154 per passenger trip, assuming a 1.6- mile trip, like the bus. An EV is approximately 8 times more efficient than the gondola.

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Response GO24-21 Refer to Response GO24-4, Responses GO24-12 through GO24-20, and Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study.

The comment compares the electricity usage of the proposed Project to the Dodger Stadium Express with electric buses and to individual electric vehicle transportation. The initial basis of the calculations in the comment is flawed as the comment relies upon an incorrect estimate of ridership from the UCLA Mobility Lab Study; refer to Topical Response O, Response to UCLA Mobility Lab Study. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for a discussion of how the ridership estimates for the proposed Project were developed. This included analysis of actual data, including a database of Dodger Stadium ticket sales, and accounted for the various modes of access that attendees choose to use. As reported in Table 3.17-4, Proposed Project Estimated Daily Riders, the estimated number of passengers traveling to Dodger Stadium for a sold-out night game (including Dodger employees) is estimated to be 6,140 for 2026 and 10,140 for 2042.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon,

and the Los Angeles State Historic Park. In addition, as discussed in Topical Response H, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

The comment provides no citation for the assumed electricity usage per mile of an average electric bus or individual electric vehicle, and it is unclear if the values provided incorporate the effects of congested traffic and queuing times as would be expected on the roadways surrounding Dodger Stadium on game days. It is also unclear if the values provided incorporate the potential effects of the hilly terrain surrounding Dodger Stadium. It would also be inaccurate to assume that each Dodger Stadium Express bus would operate at full capacity for the full extent of its route and full duration of its operations. Specifically, the buses would be mostly empty for one leg of the trip (e.g., during the pregame period after dropping off passengers at Dodger Stadium and returning to LAUS). Further, the number of passengers on the Dodger Stadium Express buses would be expected to fluctuate and diminish in off-peak hours leading to reduced efficiency values. It is also important to note that through the Transportation Systems Management Alternative, the Draft EIR evaluated the potential expansion of the existing Dodger Stadium Express and found that the alternative would not meet the majority of the proposed Project's objectives in full or in part. Additionally, the Draft EIR concluded that the Transportation Systems Management Alternative would not provide the same level of benefits as the proposed Project, such as providing a direct transit connection between LAUS and the Dodger Stadium property via an aerial rapid transit system and improving connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. These findings would not change should the Dodger Stadium Express buses run on electricity.

Regarding the commenter's assessment of individual passenger vehicles, it is not logical to compare the electricity usage of the proposed Project to the use of individual electric vehicles, since only a small fraction of those driving to Dodger Stadium are traveling in electric vehicles. Instead, one should compare the proposed Project to the passenger vehicle fleet as a whole, were the proposed Project not adopted. This type of analysis is evaluated through the No Project Alternative in Section 4.0, Alternatives, of the Draft EIR. The Draft EIR concludes that the No Project Alternative would result in higher long-term air quality emissions and increased GHG emissions in comparison to the proposed Project.

Unlike the Dodger Stadium Express with electric buses and to individual electric vehicle transportation noted in the comment, as a breakthrough and innovative technology for the region, the proposed Project would advance future alternative transportation systems and technology in the Los Angeles region while providing a template for other innovative aerial projects elsewhere in California and the United

States. The proposed Project would exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure. It would also demonstrate integration of all transportation modes. Specifically, passengers will be able to transfer from transit at LAUS to the adjacent gondola station. These qualities of the proposed Project would help show that new transportation technology can successfully operate in concert with other existing modes of transportation.

Comment Letter GO25 – Coalition for a Beautiful Los Angeles, Barbara Broide and Wendy-Sue Rosen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO25

Comment GO25-1 Dear Mr. Zelmer:

This letter is submitted on behalf of The Coalition for a Beautiful Los Angeles (CBLA) in response to the Draft Environmental Impact Report (DEIR) released by Metro for the Los Angeles Aerial Rapid Transit Project (LA ART), proposed by LA Aerial Rapid Transit Technologies LLC. The Project, which is proposed to connect Los Angeles Union Station to the Dodger Stadium property with an intermediate station at the Los Angeles State Historic Park via an aerial gondola system, is one of great concern to CBLA.

Our CBLA organization (formerly Coalition to Ban Billboard Blight), is a non-profit organization dedicated to protecting and enhancing the City's visual environment through education and political action on behalf of many important issues, including: reducing visual blight from billboards and other forms of commercial signage to promote traffic safety and improve public health; preserving urban forest and open space; establishing federally-recognized Scenic Byways; undergrounding utility lines; treating our scenic resources as treasures to be passed on to future generations; promoting equitable public policies to accomplish those goals.

Response GO25-1 This comment provides a general introduction to the Coalition for a Beautiful Los Angeles as well as a summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO25-2 through GO25-7.

Comment GO25-2 With the LA Art Project, our main concern is the lack of specificity and vaguely referenced advertising program within the gondola stations, on gondola towers, at the junction, and on the gondolas themselves and the potential significant impacts.

Response GO25-2 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's signage. The proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes Key Observation Points (KOPs) updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study. Refer to Section 3.01, Aesthetics, and the Lighting Study of the Draft EIR and Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for discussion of how the proposed Project's signage would result in less than significant impacts.

Comment GO25-3 We are also concerned about light glare and aesthetic impacts to the LA State Historic Park over which gondolas will travel at varying heights. In addition, we question whether the visual impact analysis in the DEIR appropriately uses the LA City CEQA threshold guide for analysis of park impacts, because it is a very minimal standard and should not apply.

Response GO25-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project which would be less than significant, including at the Los Angeles State Historic Park. The Lighting Study analyzed the entire proposed Project alignment including the Los Angeles State Historic Park. The analysis of light trespass impacts to the Los Angeles State Historic Park is reflected in the analysis at VP-S4 and detailed on pages 41 – 42, 44 – 48 of the Lighting Study and the analysis of glare impacts to the Los Angeles State Historic Park is reflected in the analysis at M4 and detailed on pages 49 – 53 of the Lighting Study. As explained in Section 3.01, Aesthetics, of the Draft EIR, at p. 3-1-32, with respect to light and glare, the proposed Project would have a significant impact if it would "[c]reate a new source of substantial light or glare which would adversely affect day or nighttime views in the area." The Lighting Study evaluated the potential for impacts related to light and glare using the City of Los Angeles CEQA Thresholds Guide and the California Vehicle Code significance thresholds, and also evaluated the proposed Project for compliance with a number of regulatory standards including the Los Angeles Municipal Code (LAMC), CALGreen, the CASP, and the RIO, to support the conclusion that light trespass impacts would be less than significant. Refer to Response P700-37 for a detailed discussion of compliance with these regulatory standards. CEQA Guidelines section 15064.7(b) encourages lead agencies to adopt and publish thresholds of significance for use in determining whether environmental impacts are significant. While agencies are encouraged to adopt such thresholds of significance for general use, they are not required to do so and have the authority to determine the significance of environmental impacts on a project-by-project basis. Consistent with CEQA, Metro used the thresholds of significance from Appendix G to the CEQA Guidelines in the Draft EIR. As noted above, the analysis of light trespass impacts to the Los Angeles State Historic Park is reflected in the analysis at VP-S4 and evaluated the proposed Project in that location based on the Los Angeles Municipal Code (LAMC), CALGreen, and the CASP, which are the relevant thresholds and

regulatory standards that apply to the proposed Project's lighting in the vicinity of Los Angeles State Historic Park. In sum, the proposed Project would incorporate project design features related to lighting and would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area, and would comply with applicable City regulations related to light and glare. And, as detailed in the Lighting Study, light trespass and glare impacts to the Los Angeles State Historic Park would be less than significant. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information regarding the applicable regulatory framework for review and consideration of aesthetic impacts provided in the Lighting Study.

Comment GO25-4 Neither the DEIR document nor its appendices adequately describe the Project's proposed signage program. The vague description contained in the DEIR that the "proposed Project would include signage" that "may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising" does not provide adequate information to assess impacts and attempt to identify mitigations (if possible to mitigate the impacts). The DEIR goes further to state that "Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins." (DEIR p. 2-45)

The Project Description Section 2.7.3 Signage states: "Such signage may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations." Thus, we know that the operators of the Program seek to raise advertising revenues to help support the operation of the Project. This stated reliance upon advertising revenues to help finance the Project tells us only one thing for certain. That is the potential for the addition of more and more advertising faces, structures and/or panels associated with this program should operating revenues fail to provide the revenues anticipated and/or desired.

There is clearly not sufficient information provided for the public or those responsible for evaluating the Program to assess impacts when we are not provided with any specific descriptions of what lies within the realm of possible signage programs. We request a full analysis of every type, size, and manner of sign and whether static or digital, projection, or video, single or two-faced, lighting source and intensity of lighting, changing messaging, rotation rates, proximity to traffic, whether they will project ambient glare into the Historic Park, nearby residences, and other sensitive uses, etc. A chart that identifies types and numbers of signs must be provided. Will there be inward or outward facing signs on the cabins? Will there be analytics and/or data gathering capabilities on any of the signs which will trigger the need to address privacy issues? Please explain and provide a complete detailed analysis.

Response GO25-4 Refer to Response GO25-2 for discussion of the proposed Project's signage and lighting. Refer to the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The Sign Concept Plan includes detailed drawings showing the proposed location for each sign and a signage schedule that provides sign numbers; sign types; information on whether the sign is static or digital; information on whether the sign is illuminated or non-illuminated; sign design, e.g., platform mounted, hanging, wall-mounted, wrap, etc.; information on whether the sign is interior or exterior facing; sign area including the width and height; and description of each sign.

Comment GO25-5 The provision of wayfinding signage should not present significant negative impacts if done in a consistent, tasteful manner and with signage respectful of its setting. Examples should be provided. Such signage, particularly if seen by passing drivers, should not incorporate changing messaging.

Transit information signage is provided in many cities on singular solar-powered poles with small LED text displays. Metro and LA ART do not need and should not seek to construct massive structures or advertising structures under the guise of providing transit riders with wayfaring information. The reference to "other content" is extremely troubling and opens the door to untold commercial signage.

Response GO25-5 Refer to Response GO25-2 for discussion of the proposed Project's signage and lighting. Refer to the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The Sign Concept Plan includes detailed drawings showing the proposed location for each sign and a signage schedule that provides sign numbers; sign types; information on whether the sign is static or digital; information on whether the sign is illuminated or non-illuminated; sign design, e.g., platform mounted, hanging, wall-mounted, wrap, etc.; information on whether the sign is interior or exterior facing; sign area including the width and height; and description of each sign. The proposed Project's signage would be designed to be consistent with Metro requirements including Metro's Advertising Content Guidelines as applicable, which are updated from time to time.

Comment GO25-6 Section 2.7.4 of the Project Description introduces many sources of lighting that are not sufficiently defined or described. The very presence of the LA ART project creates the need for lighting in numerous locations, including but not limited to its stations, junction, and towers. Additional lighting is to be placed underneath stations and along pedestrian access routes. The lighting is an issue not only pertaining to aesthetics, but it carries impacts to biological resources, wildlife, night sky pollution and may negatively impact those individuals who live in the area. There are many studies that document the impacts of lighting on wildlife, including this study done in conjunction with USC for the National Park Service, which is relevant to this Project because of its impacts on parkland: Longcore, T., and Rich, C., 2016. Artificial night lighting and protected lands: ecological effects and management approaches (revised August

2017). Natural Resource Report NPS/NRSS/NSNS/NRR — 2017/1493. National Park Service, Fort Collins, Colorado.

Those who live, work, or travel in the vicinity of this Project, those who visit the Historic Park, those who look upon Union Station and El Pueblo de Los Angeles as landmark and architectural icons for our City may be negatively impacted by a barrage of electronic advertising beamed via electronic displays (digital or otherwise) from stations, gondola towers, junctions, and gondola cabins.

Response GO25-6 Refer to Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, and Topical Response K, Signage and Lighting, of this Final EIR for discussion of the proposed Project's lighting. The Lighting Study concluded that the proposed Project would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area and would comply with applicable City regulations related to light and glare. Therefore, impacts would be less than significant. Refer to Topical Response K, Signage and Lighting, for discussion of how digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage.

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on page 3.4-19 of the Draft EIR, proposed Project lighting could result in indirect impacts to birds and bats. However, the Draft EIR found that, "Lighting would be low-level and primarily integrated into the architectural features. Exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the Project is not anticipated to have an indirect impact on bird and bat species. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the Project is not anticipated to have an indirect impact on bird and bat species. Therefore, operation of the proposed Project would have a less than significant impact on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS." Thus, impacts on wildlife as a result of lighting were analyzed by the Draft EIR and no further analysis is required. Furthermore, refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how development in the entire LA Basin provides a major source of light pollution, and there is no evidence that light in the vicinity of the proposed Project would draw migrant wildlife to the area, any more than similar lighting in other areas over the LA Basin would be expected to.

Comment GO25-7 We do not accept the language in the DEIR that states that "signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC)" as adequate assurance that the negative impacts of the Project's sign

program will be acceptable or adequately mitigated. Given that the LAMC is subject to change and that the adoption of sign regulations in Los Angeles has proven to be highly politicized, such language provides no long-term assurance to those who value the visual landscape and seek to reduce sign blight and halt its proliferation in the City. The introduction of (digital) signage on moving gondolas in the sky presents an entirely new form of sign blight with the only comparable image being one of the singular Goodyear Blimp that travels across the LA Basin with a very irregular presence in any one given location or community. The blimp travels at much higher elevations than the proposed gondolas and is seen only incidentally while the gondolas would have a fixed route and presence, leading not only to the impacts experienced as viewed, but contributing to harmful cumulative impacts as well.

Response GO25-7 Refer to Response GO25-2 for discussion of the proposed Project's signage and lighting.

Comment GO25-8 It is vital to consider the impacts of the advertising program on the Los Angeles State Historic Park. Should lighted advertisements appear on the outside of the moving gondola cabins there will be significant visual and aesthetic impacts at visually sensitive locations along the gondola alignment. The DEIR acknowledges the impact of the gondolas and their towers on views from the Historic Park toward the downtown skyline, a protected aesthetic resource, which will "be partially interrupted due to the Project" and this does not even take into account the impacts that would occur should outside mounted advertisements be placed on the cabins. With the advent and advancements seen in LED lighting technology, it is possible that each gondola cabin could have changing ad panels with messages that rotate within seconds. There are no descriptions as to the types, hours of operation, message rotation schedules, etc. included in the DEIR. There are no limits as to what might be installed or operated. It is therefore impossible to assess the light and glare impacts of unknown displays. The project description is faulty, analyses is deferred until later as are proposed mitigations. This makes it impossible to conclude in the DEIR that the impacts will be less than significant.

Please add our comments to the record in this case and keep us informed of any upcoming meetings and/or hearings related to this Project.

Sincerely,

Barbara Broide Wendy-Sue Rosen
Co-President Co-President

Response GO25-8 Refer to Response GO25-2 for discussion of the proposed Project's signage and lighting. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project would not impermissibly defer mitigation measures. Metro has and will comply with its obligations under CEQA.

Comment Letter GO26 – Chinese American Museum, Gay Q. Yuen, Ph.D.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO26

Comment GO26-1 Dear Mr. Cory Zelmer,

The Chinese American Museum of Los Angeles is in support of LA ART. Our museum is located in the El Pueblo Historical Monument and is adjacent to Los Angeles Chinatown, both are significant locations for LA ART.

Response GO26-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment GO26-2 While CAM's mission is to tell and educate the general public about the history and the contributions of the Chinese in America, it also takes on the advocacy role of protecting and promoting for the betterment of our Chinatown community. From the information shared with the residents of our community, LA ART represents a new innovative mode of transportation that will support our climate goals in communities that have far too long been burdened by poor air quality. We've been pleased to follow the progress of its partnership with zero emissions programs.

Response GO26-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. As discussed in the

Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO26-3 The Chinese American Museum recognizes the importance that an infrastructure of this scale represents, and it will be important to leverage such a large investment for the benefit of our community members. We applaud the willingness of LA ART to include us in conversations regarding community benefits to the neighborhoods it aims to serve. We look forward to the ongoing conversations this project is willing to have with us and other stakeholders to ensure that this project reflects the entire community and a true landmark for El Pueblo and Chinatown.

Response GO26-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment GO26-4 Since the DEIR does not discuss community benefits, we would like you to elaborate on how any additional conversations with stakeholders will be included as an official document. I or other representatives of the Chinese American Museum would be willing to participate in further discussions and conversations in addressing Community benefits.

Response GO26-4 Refer to Topical Response C, Project Features for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage,

utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The proposed Project would also provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project could partner, for example, with the Chinese American Museum to help in addressing visitor, educational, and customer access to the Museum. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment GO26-5 In addition, the Chinese American Museum is an educational resource for the diverse communities of Los Angeles through our exhibits and educational programming, aiming to ensure that our programs are reflective of our entire community. To that end, we would like to know how will the project's Alameda Station adjacent to El Pueblo de Los Angeles Historical Monument reflect the community that it is located in, including the diversity of Los Angeles?

Response GO26-5 Refer to Topical Response C, Project Features, for discussion of how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area and will be discussed with identified stakeholder groups. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community.

Comment GO26-6 One of the Chinese American Museum's objectives is to curate contemporary art that is reflective of Chinese American artists. How will the project provide opportunities for local contemporary Chinese American artists to showcase their works?

Response GO26-6 Refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would also utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Comment GO26-7 We appreciate the open dialogue LA ART has had with CAM from the beginning stages of this project and how the leaders of the project made concerted efforts to communicate with us at every stage of development. We are looking forward to continuous dialogue that will benefit Chinatown and the El Pueblo communities.

Thank you,Dr. Gay Yuen

??? ??Gay Q. Yuen, Ph.D.
Board Chair,Friends of the Chinese American Museum

Response GO26-7 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter GO27 – Trust for Public Land

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO27

Comment GO27-1 Dear Mr. Zelmer,

I am writing to express my deep concern regarding the proposed alignment of the Los Angeles Aerial Tramway (LA ART). As you may know, this private project, being shepherded by the Los Angeles County Metropolitan Transit Authority (Metro), would connect Union Station to Dodger Stadium via an aerial tram. The DEIR states that "The proposed Project would not result in any significant and unavoidable operational impacts," and concludes that "no mitigation measures required" (ES 10 p. 29 and ES 12 p. 31). Trust for Public Land disagrees with this conclusion.

Response GO27-1 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO27-3 through GO27-10.

As stated on page ES-17, Executive Summary of the Draft EIR, there would be significant and unavoidable impacts regarding construction period noise and vibration (human annoyance). Page ES-17 of the Draft EIR states the proposed Project would not result in significant and unavoidable operational impacts.

The Draft EIR identifies several required mitigation measures. Table ES-2: Summary of Environmental Impacts, which begins on page ES-22 of the Draft EIR details the required mitigation measures for each potentially significant impact. Page ES-21 clarifies, “Project Design Features (PDFs), while not necessary for the impact significance determination, are included in Table ES-2 because they are inherent in the design of the proposed Project. Best Management Practices, or other measures required by law and/or permit approvals, are also requirements of the proposed Project. Additionally, Mitigation Measures have been identified and are additional actions designed to avoid, minimize, or compensate for significant environmental impacts and are required where significant impacts have been identified based on the analyses in Section 3.0 of this document. Where applicable, Mitigation Measures are described on Table ES-2.” Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment GO27-2 Trust for Public Land works nationally to protect the places people care about and to create close-to-home parks – particularly in and near cities, where 80 percent of Americans live – ensuring livable communities for generations to come. Since 1972,

Trust for Public Land has protected more than 4 million acres and completed more than 5,400 park and conservation projects including the LA State Historic Park.

Response GO27-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO27-3

GO27-3A The finding in the DEIR is further complicated by the fact that the DEIR does identify as a "Significant Impact" the conflict with the LASHP General Plan. The DEIR describes as a "mitigation measure" the need to: "Obtain a Los Angeles State Historic Park General Plan Amendment (page 58, DEIR Executive Summary, Land Use and Planning element, LUP-2). The project asserts that "Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan."

GO27-3B The current general plan for this park does not allow for transit uses within the state park because it is a park, a vital public green space in a historically underserved community. Putting a transit use within the park was never envisioned during the park development process and it will significantly impact the park user experience. Yet the DEIR simply claims that as long as the general plan document is amended to allow for transit, that mitigates the impact.

GO27-3C In no way does an amendment in a document mitigate the on-the-ground impacts of an aerial highway through a park, or the project's usurpation of public property

Response GO27-3

GO27-3A Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A,

impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

GO27-3B Refer to Response GO27-3B for a discussion of the Los Angeles State Historic Park General Pan Amendment.

GO27-3C Refer to Response GO27-3A. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment GO27-4 Below is a list of additional areas where the DEIR falls short:

1. Tree Removal

The DEIR states the project for the Chinatown/State Park Station would require the removal of 30 trees, and the aerial rights across the park would remove an additional 51 trees. The DEIR states that in place of the lost trees would be hardscape and replacement trees elsewhere in the park. Mitigating the loss of mature trees, particularly protected native trees, with new trees is insufficient; mature trees have established complex and interconnected ecologies not easily replicated, and they sequester much more carbon than do young trees.

The DEIR also does not indicate where the replacement trees would be sited, and does not provide sufficient information to demonstrate that the alternative locations of new trees would maintain the current park experience and ecosystems. The park was thoughtfully designed by landscape architects with specific outcomes in mind to accommodate a variety of human and wildlife activities. The park is a careful balance of open space and tree canopy that allows for flexible uses, including special events such as music festivals. The landscape plan was developed based on an extensive public planning and visioning process, and further refined to accommodate large-scale special events.

Response GO27-4 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all

existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Refer to Response S2-2 regarding the Chinatown/ State Park Station and proposed Project alignment within the Park. While there may be short-term losses in carbon sequestration related to the removal of trees, the proposed Project would implement BIO-PDF-F and would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located. Accordingly, the short-term losses in carbon sequestration would occur only in the interim as replacement trees grow to the size of the existing trees. Nevertheless, over time, replacement trees would obtain similar carbon sequestration benefits as the existing trees, and would be coupled with a net decrease of approximately 6,375 metric tons of CO2e per year in GHG emissions from the proposed Project.

As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO27-5 2. Impact on Historic Resources: the Zanja Madre and Roundhouse

The Zanja Madre, or "mother ditch," is the original water conveyance pipeline that brought water from the LA River to El Pueblo de Los Angeles. During excavations in the late 1990's, Metro unearthed a portion of the original brick pipeline on the site that is now the park. This was one of the key factors of historic significance that led the State Park Commission to classify this new park as a State Historic Park. This exposed section of the Zanja Madre near the Metro track is currently a major

historical attraction of the park, the views of which would be significantly impacted by the overhead gondola route.

Response GO27-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources, including the Zanja Madre, would be either less than significant or reduced to less than significant with mitigation. The exposed section of the Zanja Madre located northwest of the Los Angeles State Historic Park near the intersection of North Broadway and Bishops Road is denoted as P-19-190309. This resource will not be directly impacted by construction given that it is located outside of the proposed Project footprint. Further, operational impacts to the setting, including potential visual impacts, are less than significant because the resource's setting has already been substantially altered from its historic state. Refer to pages 42, 52, and 91 of Appendix F for further information about P 19 190309. The views of the Zanja Madre would not be impacted by the proposed Project. Refer to Response S2-5 for a discussion of how the proposed Project would not substantially impact views, and how the proposed Project would provide a view of the exposed Zanja Madre, which is currently not visually apparent from the park.

Comment GO27-6 3. Impact on Viewsheds

The park's 2005 General Plan identifies and emphasizes the view of downtown LA from this park,"... the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. Sometimes referred to as the "front porch" of the City, there are no other sites that capture this welcoming view of downtown Los Angeles (p. 38). The park design was created to optimize the opportunities for visitors to experience this view - a major park element accessible from most vantage points.

The station and gondola lines with their constant movement will degrade that viewshed, blocking the view from some vantage points. The DEIR images are inadequate to fully capture the impact of the station on the view of downtown from numerous places in the park. Putting a large-scale station at the end of the park will affect the park experience from multiple vantage points, especially from the bridge. What is currently a spectacular vista will now be marred by a new large building that encroaches on state park land, with constant movement emanating out of that building. This is a fundamental change in the park experience and is inconsistent with the original vision outlined in the General Plan.

Response GO27-6 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation of the proposed Project using Key Observation Points (KOPs) critical or representative of the visual character of the area within each Landscape Unit (LU) utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including at Los Angeles State Historic Park. Refer to Response S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics.

Comment GO27-7 4. Impact on Park Users

One of the key elements that came out of the numerous public meetings during the park's design was the desire for quiet and tranquility. This gondola's continuous movement a mere 26 feet overhead will fundamentally alter the sense of peace and quiet in the park, a rare place of respite in a very dense, park-poor area of Downtown LA. The DEIR illustrations are highly misleading and show gondola cars, cables, and towers from a far distance, not from the vantage point of being directly overhead park users. The renderings are purposely not to scale and fail to demonstrate how the project would impact an individual sitting on a knoll right under the gondola line.

Response GO27-7 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the noise impacts from the proposed Project, including in the Los Angeles State Historic Park. As detailed therein, operational noise impacts would be less than significant.

As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Refer to Response GO27-6 for discussion of how the aesthetics impacts of the proposed Project would be less than significant, including at the Park. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, to this Final EIR for a discussion of how the KOPs were prepared. The renderings were not altered and accurately depict how the proposed Project will appear in the existing environment. The "after" KOPs are visual simulations that reflect the proposed project components and were prepared using a digital model to accurately place the proposed Project into context without distortion. Because the proposed Project is rendered in perspective to match the pedestrian eye level vantage point of the existing photographs, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance, consistent with how pedestrians experience their surrounding environment. As such, visual elements that are in the foreground can sometimes block the full view of visual elements at a distance even though the foreground

element may be of a smaller dimension. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Response S2-5.

Comment GO27-8 The DEIR dismisses the importance of open space to provide a respite from urban life when it states "Los Angeles State Historic Park is in a highly urbanized area north of downtown Los Angeles. Recreationalists that may reside in the area are assumed to be accustomed to the urban edge of the park, of which the proposed Project would become a part."(p. 74). In other words, LA ART claims it is acceptable to eliminate a portion of a public park simply because urban residents who live in an urban area are used to urban edges.

Response GO27-8 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Comment GO27-9 The entire point of the considerable investment of state taxpayer dollars to acquire and develop LASHP was to create an anecdote to urban life, bringing a major open green space, with all the associated health and wellness benefits, to those who had no such amenity. The DEIR is highly misleading to suggest that taking scarce park land and 81 mature trees, replacing them with hardscape, bathrooms and a new concessions building, and running an aerial highway across the park with gondola cars

passing every 30 seconds is somehow making the project a "part of the park." It is, in fact, destroying the park's southern end, not enhancing it or providing contributing elements.

Response GO27-9 Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Response S2-2 for a discussion of the minimal ways the proposed Project would affect park operations. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Response GO27-8 for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Responses S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment GO27-10 Lastly, I would like to call out the unavoidable impact LA Art will have on the Chinatown residents that will live beneath it. There is no scenario where residents are not impacted by the noise, sight, and regular maintenance the LA ART will cause. It is also no coincidence that this community most at risk of impacts from the LA ART is a low-income community of color. Please consider the people who will be negatively impacted every day by the gondola, not the private entity that stands to benefit from its proceeds.

With sincere regards,

Robin Mark
Los Angeles Program Director
Trust for Public Land

Response GO27-10 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project maintenance.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. The Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter GO28 – California State Park Rangers Association, David Carle

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO28

Comment GO28-1 Cory Zelmer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza Mail Shop 99-22-6
Los Angeles, CA 90012

cc: Armando Quintero, Director, California State Parks
California State Parks Commission

Re: Los Angeles Aerial Rapid Transit Project DEIR

These comments regarding the Los Angeles Aerial Rapid Transit (LAART) Project DEIR, are provided by the California State Park Rangers Association (CSPRA), an organization of active and retired State Park professionals dedicated to advancement of the highest principles of public service, established to support and preserve California State Parks for present and future generations.

Response GO28-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO28-2 through GO28-12.

Comment GO28-2 Our focus is on the impacts of this project to Los Angeles State Historic Park, (LASHP) as the proposed gondola tramway route would cross one end of the 32-acre park, including cables carrying gondola cars just 26 feet overhead, and a station building with a 98-foot-tall tower. To permit a "transportation corridor" across the park would require an amended LASHP General Plan. That amendment process should never begin. This project has no relationship to LASHP's historic purposes, is not consistent with the mission of a state historic park and would be an abuse of public land designated to be preserved for its historic and open space values.

Response GO28-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present –

eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. As discussed in Topical Response F, the LASHP General Plan identifies transportation as a "primary theme" of the park, recognizing the site's long history of transportation uses. The General Plan states: "The movement of people and products has enabled Los Angeles to become the megalopolis it is today. The Park site has been a route of transportation and commerce throughout its history. Located within bustling transportation and river corridors, the Park provides a place to reflect on the commercial and industrial activities that have shaped the city." (LASHP General Plan, p. 86.) As a safe, zero-emissions, environmentally friendly, and high-capacity transit option which operates daily to link the Dodger Stadium property, Elysian Park, and the neighborhoods along the proposed alignment to the region's rapidly growing regional transit system at

LAUS, the proposed Project advances this historical transportation theme while simultaneously providing the community a 21st century transportation option.

Comment GO28-3 The DEIR claims, without documentation, that the gondola could remove 3,000 cars from the streets and provide clean energy transportation benefits. Those claims do not hold up to expert analysis in transportation and energy research reports from the University of California, Los Angeles (UCLA).* Instead, little traffic reduction will result, according to the UCLA transportation analysis, while electric busses would be 19 times more energy efficient than a gondola.

Response GO28-3 The Draft EIR does not state or include an analysis result that 3,000 cars would be removed from the streets. The Draft EIR does not analyze "cars from the street" as it is not a transportation-related metric under the California Environmental Quality Act Appendix G or metric under the City of Los Angeles Transportation Assessment Guidelines (TAG). Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

Comment GO28-4 LASHP was created more than two decades ago, in a successful effort by a coalition of farsighted community members and organizations that pushed for the creation of a unique State Historic Park in the urban core of Los Angeles. The land was set aside to save it from development, to address a critical lack of open space in Los Angeles, and to preserve an area that played important historic roles in the development of the city. After years of public meetings and planning, the California State Parks Commission assigned this parkland the stringent protections that go along with a State Historic Park classification. There is a societal responsibility to preserve, and not diminish that accomplishment. Every state park, including LASHP, is protected as a

unique and special place. It is wrong for developers to target parks as relatively inexpensive routes across what they perceive as "open public land." This park, and all state park units, are held in public trust for the benefit of the people.

Comments follow about specific concerns in the DEIR.

Response GO28-4 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Responses to the comments contained in this letter are provided below in Responses GO28-5 through GO28-13.

Comment GO28-5 Specific comments by CSPRA to LAART DEIR:

Page 58 of the DEIR Executive Summary, Land Use and Planning element, LUP-2, identifies as a "Significant Impact" the conflict with the LASHP General Plan, and describes, as a "mitigation measure" the need to: "Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan." This approach pushes analysis of the impacts to the park and its visitors out of the DEIR and onto the shoulders of the California State Parks Commission. However, the appropriate place for that analysis is within the project DEIR, where concerns listed below should have been addressed.

Response GO28-5 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority

related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment GO28-6 Appendix C, Visual Elements, includes Table 3-1 on pages 16 and 17, "Los Angeles General Plan Goals and Guidelines." However, the visual analysis that follows draws conclusions that are inconsistent with those goals and guidelines. Specifically, the General Plan "Natural Resources" topic calls for establishing "the Park as an important natural open space in the Los Angeles Urban area" (emphasis added) and protecting "and enhancing scenic viewsheds and features…by minimizing adverse impacts to aesthetic resources." An example of the philosophical approach to state historic park management is provided where the Plan calls for "providing visitors with positive natural fragrances and sounds, such as the scent of landscape plantings and sounds of birds and water."

Response GO28-6 Refer to Response GO28-2 for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. The Draft EIR analyzed the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics (see pages 3.11-39 to 3.11-41). As detailed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, consistent with the General Plan's Aesthetic Goal, the proposed Project would protect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources. The proposed Project's design would incorporate appropriate urban design elements at the neighborhood level, preserve natural viewsheds of hillside areas, as well as protect additional open space and aesthetics resources consistent with policies from the Los Angeles State Historic Park General Plan. The proposed Project's design and building materials would complement the architectural themes of the neighborhood and would complement the visual character of the existing buildings in the area. The proposed Project's Chinatown/State Parks Station location would not block any designated scenic vistas, alter scenic resources, or block panoramic views.

Additionally, potential impacts to visual quality and character are minimized by the location of the Chinatown/State Park Station, which is in the southernmost portion of the park, away from the open passive park areas. The Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and the design would complement the existing buildings in the area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by proposed Project riders and park visitors alike are designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park.

Comment GO28-7 Appendix C, KOP 16-20, pages 71-74, provide analysis of visual impacts to LASHP, with specific reference to photos 5-18 through 5-22 (comparing existing and simulation views), on pages A18 – A22 of Appendix A. It is challenging to evaluate the text when it references imagery provided later in the document. The focus of the discussion is primarily on distant skyline views and never adequately addresses or effectively illustrates more immediate visual and experiential impacts to park visitors. No consideration is made here of visual awareness or feelings about the invasive presence of cables carrying large gondolas to transport up to 5,000 people per hour in each direction just 26 feet overhead (20 feet for a six-foot-tall person), The photo simulations in Figures F-18, 19, and 20 come closest to depictions of overhead presence. Image 5020a includes groups of park visitors spread out across the area, but adding a simulation to include the cables and cars cannot reveal any reactions from those people to that invasive presence. Still photos cannot portray the attention-grabbing movement of the gondola cars. The DEIR, limited by focusing mostly on distant views, concludes that impacts are insignificant because cables are just part of a busy scene that includes other existing lines, and gondola cabins would be constantly moving in and out of view. That very movement – one gondola cabin after another in rapid motion -- is instead a convincing argument for a significant impact.

Response GO28-7 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Response S2-5 for discussion of the LASHP General Plan. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park. Nevertheless, the the Final EIR includes additional KOPs to further analyze viewshed impacts to Los

Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental KOPs, views from the park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. Further, The location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area.

Comment GO28-8 We find these sentences on page 74 to be telling examples of a blindness in this analysis to traditional park values and the unique purpose of LASHP to address a critical lack of open space in Los Angeles: "Los Angeles State Historic Park is in a highly urbanized area north of downtown Los Angeles. Recreationalist that may reside in the area are assumed to be accustomed to the urban edge of the park, of which the proposed Project would become a part." (Emphasis added). Transforming part of the park into an "urban edge" is unacceptable and inconsistent with the General Plan.

Response GO28-8 Refer to Response GO28-2 for discussion of the location of the proposed Project within the Los Angeles State Historic Park; how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project; and the Los Angeles State Historic Park General Plan Amendment. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment GO28-9 The discussion becomes argumentative when addressing iconic distant views towards the downtown skyline: "Existing views of downtown from other areas in the park are already interrupted under existing conditions by trees and intervening development." The existence of current spots where the views are interrupted does not justify adding more. "A visual benefit of the Project near Los Angeles State Historic Park would also be the Park amenities, potential mobility hub, pedestrian improvements, and installation of hardscaping and landscaping at the southern entrance to Los Angeles State Historic Park, which currently only includes hardscaping." The text then lists these so-called visually beneficial amenities as 740 square feet of concessions, 770 square feet of restrooms, and a 220 square-foot covered breezeway. It seems exceedingly odd to suggest that this list, plus the associated 98-foot-tall tower

(unmentioned here) provides any visual benefit to a State Historic Park. Rather, they are new and significant changes.

Response GO28-9 Refer to Response GO28-7 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Response GO28-8 regarding the additional benefits to the Los Angeles State Historic Park.

Comment GO28-10 Unmentioned here is how many currently growing park trees would be removed nearby to accomplish this installation.

Response GO28-10 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment GO28-11 Design option E, page 21 of the Executive Summary) addresses the pedestrian bridge from the park over rails toward Chinatown. While that project has been identified as a goal for State Parks, this gondola project, with its many environmental impacts for the park, is not required to accomplish bridge access and inclusion within this flawed proposal is not necessary.

Response GO28-11 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. While not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the

State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment GO28-12 Regarding the alignment alternatives described in the Executive Summary on page 19, the Transportation Systems Management Alternative, also identified as the Environmentally Superior Alternative, or the No Project Alternative, are preferred by CSPRA, as having no direct impacts on LASHP.

Response GO28-12 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Section 4.0, Alternatives, of the Draft EIR, the No Project Alternative would not meet the majority of the Project's Objectives in full or in part, and the environmental benefits of the proposed Project would not be realized through the No Project Alternative.

Comment GO28-13 To repeat a point made earlier in our letter, this project has no relationship to LASHP's historic purposes, is not consistent with the mission of a state historic park, and would be an abuse of public land designated to be preserved for its historic and open space values.

David Carle

CSPRA President
www.cspra.com

*John Christensen. "LA Art Gondola Energy Use Analysis." Institute of the Environment and

Sustainability, Luskin Center for Innovation. October 24, 2022
"Dr. Brian Yueshuai He and Dr. Jiaqi Ma. "Study Finds Proposed Aerial Gondola to Dodger
Stadium Will Do Little to Reduce Traffic and Emissions." UCLA Mobility Lab at the UCLA
Samueli School of Engineering, October 24, 2022.

Response GO28-13 This comment provides a general conclusion of the comments raised within this letter. Responses to the comments contained in this letter are provided above in Responses GO28-2 through GO28-12.

Comment Letter GO29 – Clockshop, Sue Bell Yank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO29

Comment GO29-1 Dear Mr. Zelmer:

Below are comments for the Los Angeles Aerial Rapid Transit Project DEIR from Clockshop.

Clockshop is a 501c3 nonprofit that has worked in partnership with California State Parks for nearly a decade to provide free community arts and cultural events in public green spaces. Some of our key programs include an annual Kite Festival in LA State Historic Park, a Reading and Listening by Moonrise concert series, youth arts workshops, and temporary public art installations by some of LA's most rigorous BIPOC visual artists. Over 10,000 community members yearly take advantage of our free cultural offerings. We often work in partnership with environmental justice advocates, because we see our work in the arts as a key pathway for community members to form emotional connections to public land and advocate to preserve it. As part of that work, we speak out against private developments and government infrastructure projects that negatively affect the communities around the public park spaces that we work within, and advocate for those that provide better access and sustainability for those communities. Clockshop became aware of this project in 2018 and has researched and engaged with partners in assessing the impact of this project on the park and the surrounding communities.

Response GO29-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment GO29-2 "The Project" we reference is the private aerial tramway that LA ART intends to build on behalf of Frank McCourt to go 1.2 miles from Union Station to near the gold line stop and then over the LA State Historic Park and residential communities to Dodger Stadium. The Project has been billed as a sustainable project that will take 3,000 cars off the road. It purports to be a "privately" funded project created to move people to a single private for-profit enterprise and is being billed as a public transportation project. We believe that this is a gross misrepresentation of what this project actually is, which is a private development that will steal public land, negatively impact communities of color, and pre-mitigate shady profit-driven future developments that have not been transparently presented to the public.

Response GO29-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero

Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, and how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment.

Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment GO29-3 Clockshop is strongly opposed to this project, as it would deeply impact our operations as a non-profit, and would incredibly negatively impact LA State Historic Park, which is the key site for most of our arts and cultural activities. Here are some further details:

1. The aerial tramway will eliminate a beloved annual Kite Festival.

Nearly 5,000 people, 70% of whom were people of color from Chinatown, Lincoln Heights, and Solano Canyon (neighborhoods surrounding LA State Historic Park) attended our last Kite Festival in 2022. The tramway will make this annual, free, and beloved community event impossible to produce, as its pathway travels directly over the park.

Response GO29-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, including the Kite Festival, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice.

Comment GO29-4 2. The tramway will interrupt community arts and cultural programming at the LA State Historic Park.

Free public programming at the park, including readings, conversations, and experimental music, will be negatively impacted by the interrupted viewsheds and noise of the aerial tramway.

Response GO29-4 Refer to Response GO29-3 for discussion of how with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including at Los Angeles State Historic Park. Refer to Response to Comment S2-5 for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics. Refer to Response S2-5 discussing how the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the noise impacts from the proposed Project, including to the Los Angeles State Historic Park. Operational noise impacts would be less than significant.

Comment GO29-5 3. The aerial tramway is an injustice to the communities that fought for LA State Historic Park.

This park was fought for by the community for decades, and now a private developer billionaire will take part of the park away from them. This is a huge injustice, to take their viewsheds and their park for no reasonable purpose.

Response GO29-5 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response GO29-4 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment GO29-6 4. Over 75 mature-growth trees ranging between 15' and 50' are slated to be removed.

The State's 30 / 30 plan (CA climate change report) is being entirely ignored by LA ART, Climate Resolve, the City, and Metro. 30 / 30 calls for the preservation/ conservation of ALL HABITAT in red zones. Los Angeles County is officially a red zone, and the aerial tramway will destroy important habitat.

Response GO29-6 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

As discussed in Section 4.1.3, Impacts to Wildlife from Tree Removal, of Appendix G to the Final EIR, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In addition, the only areas of tree removal that could be potentially described as wooded habitat are the following: the small grove of Fremont cottonwood trees at the western end of the Los Angeles State Historic Park, the non-native woodland at the Stadium Tower and associated fire buffer, and the non-native woodland at the Dodger Stadium Station location. The total area of wooded habitat that would be removed in each of these areas is 0.24, 1.02, and 0.39 acres, respectively. This area of wooded habitat is relatively small compared to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park. Accordingly, while the removal of trees will result in a marginal reduction of suitable tree habitat in the short-term, such habitat loss would not result

in substantial population level impacts. Moreover, in the long-term, the replacement of trees proposed for removal would more than offset any realized impacts associated with the proposed Project.

The comment cites California's 30x30 initiative, following Governor Newsom issuing the October 2020 Executive Order N-82-20 which committed California to the goal of conserving 30% of its lands and coastal waters by 2030. Under that goal, "an area is considered a '30x30 Conservation Area' if it meets the following definition: land and coastal water areas that are durably protected and managed to sustain functional ecosystems, both intact and restored, and the diversity of life that they support. 'Durably protected and managed areas' within California's 30x30 initiative encompass" areas under government ownership or control or under perpetual easements that are designated to protect species and their habitat. (Pathways to 30x30 California, p. 25.) The California Natural Resources Agency recognizes that the "best available datasets for identifying 30x30 Conservation Area lands in California assign protected areas into [USGS GAP Analysis Program] codes based on the degree of biodiversity protection for conserved areas. GAP status codes 1 and 2 are generally consistent with" the definition of 30x30 Conservation Areas "as they include areas with a high degree of durable protection and management for biodiversity or ecosystem values." "Examples of lands and waters that are often coded as GAP 1 in California include most national parks, wilderness areas, ecological reserves, and wild and scenic rivers . . . Areas coded as GAP 2 in California include most national wildlife refuges, state parks, state conservation areas national seashores, as well as some local and regional open space, private conservation lands and easements." (Pathways to 30x30 California, p. 29.) Based on a search of the California Protected Areas Database and California Conservation Easement Database, and their associated GAP codes, the proposed Project alignment is not located within a 30x30 Conservation Area.

Comment GO29-7 5. The aerial tramway WILL have a negative environmental impact.

Contrary to LA ART's claims, the pouring of thousands of pounds of concrete and the construction of this station will have a very negative environmental impact on the land and surrounding communities.

Response GO29-7 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment GO29-8 6. The aerial tramway is not needed and is not a public infrastructure project.

This is a private project, benefiting a private entity. A stop at the Chinatown station is duplicative and is not needed. The Dodger express represents non-invasive buses (soon to be fully electric) already routed and funded. The existing Dodger Express has been consistently cited as the preferred method of transport by community stakeholders.

The infrastructure already exists, and the Dodger Express team has committed to electrifying all the buses as a response to climate change. This alternative is preferred by Clockshop, and our community and stakeholders at large as it does not pour thousands of pounds of concrete into an already stressed community, does not remove precious park space, and does not remove important natural habitat.

Response GO29-8 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to

achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.16, Public Services, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO29-9 Conclusion

Clockshop strongly opposes this project, which would layer unnecessary negative environmental impact, remove free public park space and viewsheds, and interrupt or remove free community cultural programs that serve primarily surrounding communities of color. It is not fair, and it is not right to do this to the generations of community members that fought for this public green space with blood, sweat, tears. There is no public benefit to this project that does not already exist in another already funded, already public, free form (i.e., the Dodger Express).

The manner in which electeds and Metro have conducted this process is utterly shameful and displays a flagrant disregard for the residents and communities being impacted, not to mention the law.

Clockshop's staff, board, and diverse community of parkgoers agree that this project should be immediately terminated.

Sincerely,

Sue Bell Yank
Executive Director, Clockshop
Cc: Supervisor Hilda Solis, Mayor Karen Bass, Congressmember Jimmy Gomez, Assemblymember

Miguel Santiago, Assemblymember Wendy Carillo, Councilmember Eunisses Hernandez

Response GO29-9 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. This comment also provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO29-2 through GO29-8.

Comment Letter GO30 – Los Angeles Union Station Historical Society, Thomas R. Savio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to GO30

Comment GO30-1 Dear Mr. Zelmer,

The Board of Directors (The Board) of the Los Angeles Union Station Historical Society (LAUSHS), a non-profit, Section 106 designated historic preservation consultant for Los Angeles Union Station (Union Station), a world recognized National Historic Landmark owned by Los Angeles County Metropolitan Transit Authority (Metro), has voted to formally comment against Los Angeles Aerial Rapid Transit's (LA ART) private, for-profit cable car line (aka "Frank McCourt's Gondola") and its public land and air rights development scheme that proposes to link Union Station and Metro's related "Esplanade-Forecourt" project with Dodger Stadium that The Board believes is contrary to Metro's public participation policy and illegal (pending a Superior Court decision) "accommodation" for LA ART. The Board believes that LA ART's proposed "futuristic-Carnaval" Union Station Terminal on Alameda Street and Metro's supporting "Esplanade-Forecourt" project will blight the viewscape of the historic and architecturally significant west facade of Union Station, and that Union Station, its trains and patrons could be physically harmed if aircraft from the nearby Los Angeles Police Department's "Hooper Memorial Heliport" airport become entangled in LAART's overhead cables, gondolas and 13-story towers. Furthermore, The Board opposes Metro's planned removal of all "Disabled Parking" spaces from the "Esplanade-Forecourt" area, without public hearings and reasonable alternatives, to accommodate a new so-called "water feature" (aka a fogging-type water fountain) which will cool LAART patrons cued-up for their rides to New Chinatown and Dodger Stadium. Moreover, the water feature would be contrary to the state's water conservation policy. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

Until now, The Board has steadfastly refused to take sides in the above major, billionaire development scheme.

However, in The Board's opinion, Metro and its staff have obviously taken a pro-active role supporting LAART, a potential competitor of Metro's efficient "Dodger Stadium Express" bus service, as well as planning to "gild the lily" of Union Station with its Esplanade-Forecourt Project, all "backstage," using public land, resources and airspace but without public participation as required by Metro policy and the law, before METRO agreed to be "engaged" by LAART.

Among the reasons for The Board's opposition are, but not limited to:

Response GO30-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. This comment provides

a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO30-2 through GO30-8.

Comment GO30-2 A) Metro Board member, the former Mayor of Los Angele Eric Garcetti, who originally introduced the motion for Metro to assist LAART without public participation and to enlist Metro staff to "carry LAART's water" as it were, did receive, according to public records, millions of dollars in both "behest payments" and political cash contributions from Billionaire real estate and LAART developer Frank McCourt and/or his family and various entities and associates, which in The Board's opinion, is an apparent conflict of interest. Consequently, Metro is being sued by the non-profit California Endowment for willfully preventing public participation in Metro's decision to partner with LAART. (Ironically, Metro is using public resources to defend itself before Superior Court.)

Response GO30-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. This comment also raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment GO30-3 B) In The Board's opinion, Metro Deputy Executive Officer Cory Zelmer and/or subordinates falsified an official environmental document--LAART's Draft Environmental Impact Report (DEIR)--by checking-off the DEIR box that states there is no airport within 2 miles [3520 yards] of LA ART's proposed Union Station Terminal,

when he had been informed repeatedly to the contrary by The Board. Moreover, The Board presented proof to Zelmer and his superior, Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport" (variously described as the country's or the world's busiest airport for rotary-winged aircraft aka helicopters) is only 1/2 mile (880 yards) from LA ART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer and Wiggins that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports officially defined as a location where any flying machine is serviced. The fact that some airports serve only rotary-winged aircraft (helicopters) while others serve fixed-wing aircraft (conventional-winged aircraft) does not change the fact that: all heliports are airports in the eyes of all governing agencies and the Federal Courts. Furthermore, the argument presented by Metro that Hooper Memorial is a police facility, not a civilian facility, and therefore not subject to the LAART DEIR, is illogical and fallacious. A helicopter that becomes entangled in LAART's cables, gondolas and 13-story towers and consequently crashes into Union Station, its trains and patrons, could cause catastrophic harm regardless had that aircraft launched from a police facility or a public facility. Simply put, LAART's proposed location is not safe for the Union Station community and helicopters from Hooper Memorial Heliport airport. Please note, the Rules and Regulations of Los Angeles Union Passenger Terminal has for decades stated: "General Notice A. Safety is of the first importance in the discharge of duty." Or did Metro abolish this paramount railroad safety rule when it bought Union Station?

Response GO30-3 The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus,

comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the draft EIR, is based on FAA analysis standards, and concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment GO30-4 C) Contrary to the promises made to The Board by Stephanie Wiggins, Cory Zelmer and LAART, no meeting has ever been organized between them and The Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LAART's Union Station Terminal. In fact Metro forbade The Board's examination of the only known 3-D scale model of Union Station's location because, in The Board's opinion, of a deliberate subterfuge that the model dating from former Union Station owner--the Santa Fe Railway--is too old to be accurate today, and furthermore the sharing of the model with The Board would somehow be a "conflict of interest"(?) even though The Board previously had access to the model. However, The Board's use of the model did not depend on the model's age, but only the juxtaposition of Union Station with Alameda Street which has not changed appreciably since the station was opened in 1939. Consequently, at a loss for options, The Board asked LAART to produce a 3-D scale model given its apparent resources, but LAART has never responded. This "shadow play," in The Board's opinion, was being performed by LA Metro and LAART to obfuscate the issues and delay public criticism of LAART contrary to the public weal which Metro is obliged to serve. Furthermore, since the model is public property, The Board's use should have been permitted so it could be compared to LAART's distorted artist's rendering of its Futuristic- Carnaval Alameda Street Terminal with Union Station's Hispanic-Cathedral style. Finally, after wasting The Board's time and resources for over a year, in December 2022 Metro provided to the general public an aerial diagram of LAART's Alameda Terminal that is in the worst possible viewscape location--directly in front of Union Station! Cable car rides have their place but not in front of Los Angeles' world famous "Cathedral of Transportation."

Response GO30-4 Refer to Response GO30-3 for a detailed discussion of Hooper Heliport. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which

would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment GO30-5 D) In The Board's opinion, LAART is designed to compete with Metro's "Dodger Stadium Express," a highly efficient road service that could be further improved if Metro switched to modern, environmentally friendly motor coaches that it might fund by the savings from not building its Esplanade-Forecourt project.

Response GO30-5 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction,

Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. While some riders of the Dodger Stadium Express are likely motivated by traveling in more sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles traveled (VMT) to Dodger Stadium than the proposed Project, which would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Comment GO30-6 E) Given the seasonal nature of baseball, it is also The Board's opinion that LAART is a "Trojan Horse" scheme to facilitate year-around, for-profit real estate development in Dodger Stadium's vicinity at the expense of public land and airspace as well as the viewscape of magnificent Union Station.

Response GO30-6 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Response GO30-4 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant including at LAUS. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment GO30-7 F) Metro's proposed Esplanade-Forecourt project, according to Metro employees--who wish to remain anonymous for the sake of their careers--will be funded by so-called "overlap money" that was "peeled-off" from Metro's defunct LINK-US project that itself was rejected because of The Board's and the public's opposition. Moreover,

Metro has stated to The Board's Executive Director via telephone that ultimately the Esplanade-Forecourt project will come to fruition by a two-step process eliminating all public parking including "disabled parking" from in front of Union Station without public discussion or participation in violation of the Americans with Disabilities Act (ADA). (A disabled motorist has already filed a formal complaint with the ADA authorities against Metro's Esplanade-Forecourt project.) Step one would be the "temporary" elimination of all Union Station west front parking for the construction vehicles needed to build the Esplanade-Forecourt project followed by step two—well there really isn't a step two—when the project is completed there won't be any parking spaces left permanently. Not only will this negatively impact the "disabled Parking" but also the parking for Metro's tenants the Homebound Restaurant and Brewery, TRAXX restaurant and the numerous social and artistic events that take place in the great "Ticketing Hall" which has fallen from use given computerized ticketing. Furthermore, according to a retired Metro staff person, the Esplanade's so-called "water feature" (a fogging-type water fountain) will likely attract more "homeless" citizens seeking "showers" contrary to Metro's stated policy--according to former Metro Union Station supervisor the late Ken Pratt--of not catering to the needs of the "homeless." In The Board's opinion, Metro's Esplanade Project is designed to cool future LAART and Olvera Street tourist attraction visitors as they saunter between Union Station, LAART and Olvera Street. (While Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street tourist attraction" per se was invented in 1930 by a husband-and-wife real estate development team who went on to develop Los Angeles' "New Chinatown tourist attraction." (Ironically, Old Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled after building the railroad to Los Angeles, then Union Station was then built on top of Old Chinatown's rubble.)

Response GO30-7 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment GO30-8 G) Finally, building the Esplanade-Forecourt project's water-feature while semi-desert Los Angeles is experiencing one of its worst droughts in history flies in the face of the State of California's policy to conserve dwindling natural resources. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what The Board believes is driving LAART and Esplanade-Forecourt schemes—the greed of land developers, the greed of Metro careerists and ultimately the greed of politicians! Or, to paraphrase the immortal Yogi Berra: "It's 'Chinatown' (the movie) all over again."

Response GO30-8 Refer to Response GO30-7 for discussion of how the proposed Project does not include a water fountain in the planned LAUS Forecourt. As described on page 2-49 in Section 2.0, Project Description, of the Draft EIR, the proposed Project includes

several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment GO30-9 For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society opposes construction of LAART and LA Metro's related Esplanade-Forecourt Projects in the interests of honest government, Los Angeles Union Station preservation, the environment and safety.

Respectfully,

/s/
Thomas R. Savio Executive Director
Los Angeles Union Station Historical Society

Cc: Karen Bass, Mayor of Los Angeles Stephanie Wiggins, Metro CEO

Response GO30-9 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO30-2 through GO30-8.

Comment Letter GO31

This comment number has intentionally been skipped.

Comment Letter GO32 – Sue Bell Yank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO32

Comment GO32-1 Dear Ms. Rockwell,

On behalf of Clockshop, I'm writing to request that the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report (DEIR) be no less than 90-days.

Response GO32-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment GO32-2 From METRO's communication shared on September 28, 2022, there is no clarity on how long the public comment period will last or how community members are expected to participate.

Response GO32-2 The Draft EIR was released on October 17, 2022, for a 60-day public review period. Refer to Response GO32-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO32-3 for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period.

Comment GO32-3 The two meetings scheduled after the DEIR is released clearly state that no public comment will be taken. It is imperative that the community be given an opportunity to meaningfully participate in the CEQA process by providing a total of 90-days to comment and a clear pathway to engage.

Response GO32-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public

hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment GO32-4 To date, our communities have been shut out of this process, with little to no details being shared. The few details provided by LA ART are wholly insufficient to understand the complexities of a project that will greatly impact surrounding communities.

Response GO32-4 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment GO32-5 Frankly, we deserve better. We must be heard and provided with a chance to meaningfully participate in the CEQA process. From our experience, we know that DEIR's like this one are lengthy, complex documents with technical information that will require significant time to review and analyze. It is our understanding that similar environmental review processes such as the South Los Angeles and Southeast Los Angeles Community Plan and the LA Zoo Vision Plan have also been extended beyond 45-days.

Response GO32-5 The Draft EIR was released on October 17, 2022, for a 60-day public review period. Refer to Response GO32-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO32-3 for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. Refer to Response GO32-3 for discussion of the opportunities for public comment during the public review period.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public participation opportunities during the Draft EIR public review period. The format of the in-person public meetings immediately preceding, during, and immediately following, the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment GO32-6 The DEIR has been delayed numerous times, and if you proceed with a 45-day comment period, what message does that send to our communities? You can delay the release of the DEIR but not extend a public comment period that will be held during the holiday season when it is challenging for community members to participate. There is no need to rush through this process at this stage.

Response GO32-6 Refer to Response GO32- 1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Under CEQA, the purpose of a Final EIR

is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment GO32-7 Finally, extending the public comment period is critical for transparency and fairness. Councilmember-elect Eunisses Hernandez, who has voiced concerns and will represent the communities most impacted by this project, deserves the chance to review and analyze the DEIR.

Please do the right thing by extending the comment period to a total of 90-days.

Sincerely,

Sue Bell Yank

Response GO32-7 Refer to Response GO32- 1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter GO33 – Sue Bell Yank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO33

Comment GO33-1 Dear Ms. Rockwell,

On behalf of Clockshop, I'm writing to request that the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report (DEIR) be no less than 90-days.

Response GO33-1 This is a duplicate of Comment GO32-1. Refer to Response GO32-1.

Comment GO33-2 From METRO's communication shared on September 28, 2022, there is no clarity on how long the public comment period will last or how community members are expected to participate.

Response GO33-2 This is a duplicate of Comment GO32-2. Refer to Response GO32-2.

Comment GO33-3 The two meetings scheduled after the DEIR is released clearly state that no public comment will be taken. It is imperative that the community be given an opportunity to meaningfully participate in the CEQA process by providing a total of 90-days to comment and a clear pathway to engage.

Response GO33-3 This is a duplicate of Comment GO32-3. Refer to Response GO32-3.

Comment GO33-4 To date, our communities have been shut out of this process, with little to no details being shared. The few details provided by LA ART are wholly insufficient to understand the complexities of a project that will greatly impact surrounding communities.

Response GO33-4 This is a duplicate of Comment GO32-4. Refer to Response GO32-4.

Comment GO33-5 Frankly, we deserve better. We must be heard and provided with a chance to meaningfully participate in the CEQA process. From our experience, we know that DEIR's like this one are lengthy, complex documents with technical information that will require significant time to review and analyze. It is our understanding that similar environmental review processes such as the South Los Angeles and Southeast Los Angeles Community Plan and the LA Zoo Vision Plan have also been extended beyond 45-days.

This is a duplicate of Comment GO32-5. Refer to Response GO32-5.

Comment GO33-6 The DEIR has been delayed numerous times, and if you proceed with a 45-day comment period, what message does that send to our communities? You can delay the release of the DEIR but not extend a public comment period that will be held during the holiday season when it is challenging for community members to participate. There is no need to rush through this process at this stage.

Response GO33-6 This is a duplicate of Comment GO32-6. Refer to Response GO32-6.

Comment GO33-7 Finally, extending the public comment period is critical for transparency and fairness. Councilmember-elect Eunisses Hernandez, who has voiced concerns and will represent the communities most impacted by this project, deserves the chance to review and analyze the DEIR.

Please do the right thing by extending the comment period to a total of 90-days.

Sincerely,

Sue Bell Yank

Response GO33-7 This is a duplicate of Comment GO32-7. Refer to Response GO32-7.

Comment Letter GO34 – Thomas R. Savio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO34

Comment GO34-1 Dear Ms. Harper,

This letter is to inform you that the Los Angeles Union Station Historical Society (LAUSHS) Board of Directors, a non-profit, Section 106 historic preservation consultant for Los Angeles Union Station, a National Historic Landmark, has voted to campaign against Los Angeles Aerial Rapid Transit (LA ART), a for-profit cable car development, aka "Frank McCourt's Gondola," that plans to link LA Metro's Los Angeles Union Station with Dodger Stadium where Mr. McCourt owns one-half of the parking lot and leases the other half from the Los Angeles Dodgers, and LA Metro's "Esplanade Project" that our Board believes to be an "accommodation" for LA ART and the Olvera Street Merchants Association.

Response GO34-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses GO34-2 through GO34-11.

Comment GO34-2 Our Board believes that the proposed LA ART "futuristic" Union Station Terminal on Alameda Street and LA Metro's adjacent "Esplanade Project" will blight the very historic, architecturally significant facade of Union Station

Response GO34-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections

between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment GO34-3 which itself could be endangered Union Station and its patrons if helicopters from the nearby Los Angeles Police Department's Hooper Memorial Heliport airport become entangled in LA ART's overhead cables.

Response GO34-3 The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus, comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. Refer to Draft EIR Appendix O, Airspace Analysis Technical Memo. That analysis, based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment GO34-4 Furthermore, our Board opposes LA Metro's planned removal of all "Disabled Parking", without public hearings, from the same location to accommodate it's "Esplanade Project's" so-called "water feature" (aka a water fountain)

Response GO34-4 Refer to Section 2.0, Project Description, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment GO34-5 which itself would be contrary to water conservation policy. Even if the water feature recalculates its water at least 10% will be lost to evaporation day after day after day.

Response GO34-5 As described in Draft EIR Section 2.0, Project Description, page 2-49, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment GO34-6 Consequently, it is only right that our Board present the reasons why it has taken these positions. Until now, our Board has steadfastly refused to take sides in these major multi-million-dollar schemes. However, LA Metro and its staff, in our Board's opinion, have obviously taken a supportive role for LA ART, a potential competitor of LA Metro's efficient "Dodger Express" service, as well planning to "gilt the lily" with its Esplanade Project

Among the reasons for our Board's actions are, but not limited to:

A) The LA Metro Board member, Eric Garcetti, who introduced a motion to assist LA ART, without public discussion, and enlist LA Metro staff to "carry LA Art's water" did receive, according to public records, millions of dollars in both political and "behest payments" from Frank McCourt and his various entities and associates, which in our Board's opinion, has the serious appearance of a conflict of interest. Consequently, LA Metro is being sued by the non-profit California Endowment for preventing public participation prior to deciding to "partner" with LA Art.

Response GO34-6 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment also raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate).

There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment GO34-7 B) LA Metro Deputy Supervisor, Cory Zelmer, in our Board's opinion, may have falsified an official document-LA ART's Draft Environmental Impact Report--by checking off the box that states there is: "no airport within two miles" of its proposed Union Station Terminal, when he had been informed repeatedly to the contrary by our Board. Moreover, our Board produced evidence that the Los Angeles Police Department's Hooper Memorial Heliport"--variously described as the country's or the world's busiest airport for rotary-winged aircraft (aka helicopters)--is about one-third of a mile from proposed LA AR T's proposed Union Station Terminal.

Moreover, our Board reminded LA Metro CEO Stephanie Wiggins and her Deputy Zelmer that according to the Los Angeles Police Department, CalTrans, the California Public Utilities Commission, the Federal Aviation Administration and the 8th U.S. Court of Appeals all "heliports" are "airports." The fact that some airports are restricted to helicopters and others open to both helicopter aircraft and fixed-wing aircraft (passenger airplanes) doe not change the simple fact that all "heliports" are "airports."

C) Contrary to the assurances made to our Board, by CEO Stephanie Wiggins, Deputy Zelmer and LA ART, no meeting has been organized between them and our Board to explain the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport.

Response GO34-7 Refer to Response GO34-3 for discussion of Hooper Heliport.

Comment GO34-8 D) LA Metro has forbidden our Board's examination of the only known scale model of Los Angeles Union Station's vicinity, because of, in our Board's opinion, a subterfuge that the model, dating from the former Union Station owner--the Santa Fe Railway--is now dated by simply by age and thus unacceptable, and furthermore the sharing of the model with our Board would be somehow "a conflict of interest" even though our Board previously had access to the model in years past. However, our Board's use of the model does not depend on the date of the model buildings per se but only the juxtaposition of Alameda Street and Union Station which has not changed at all since the station was opened in 1939. Consequently, at a loss for options, our Board asked LA ART to produce model given its great resources, but LA ART never responded. This "shadow play," in our Board's opinion, is being performed by LA Metro and LA ART to obfuscate the issues and delay public crittism in favor of LA ART and contrary to the public weal. Furthermore, since the model is public property its use should be continued by our Board and the public so it can be compared it to LA ART's distorted wide-angle artist's renderings of its proposed "futuristic-style" Union Station Terminal with Los Angeles Union Station's monumental "Hispanic-Art Deco style." Cable car rides belong in San Francisco and Disneyland, not in front of our beautiful "Cathedral Of Transportation.

Response GO34-8 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment GO34-9 E) In our Board's opinion LA ART is designed to compete with LA Metro's "Dodger Express," a low-fare, highly efficient service that could be even better if Metro switched to modem natural gas and/or battery-powered motor coaches funded by the savings from not building its Esplanade Project.

Response GO34-9 Refer to Response GO34-6 for discussion of the Dodger Stadium Express. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. While some riders of the Dodger Stadium Express are likely motivated by traveling in more

sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles traveled (VMT) to Dodger Stadium than the proposed Project, which would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program.

Comment GO34-10 F) LA Metro's proposed Esplanade Project, according to LA Metro persons--who remain anonymous for the sake of their careers--will be funded by so-called "overlap money" that was "peeled-off" LA Metro's defunct "LINK-US" project that was rejected because of our Board and the public's opposition. According to a former LA Metro professional, the Esplanade fountain will likely attack more disadvantaged "street denizens" seeking showers," contrary to LA Metro policy. The Esplanade's "water feature" (aka "fogging" water fountain) in the opinion of our Board is designed to cool-off future LA ART and "Olvera Street" customers as they walk between Union Station, LA ART's Terminal and the circa 1930's "Hispanic" Olvera tourist attraction. (While Olvera Street's right-of-way and some of its structures are historic, the "Olvera Street" attraction was developed by a wife and husband real estate team that went on to develop Los Angeles' current "Chinatown" tourist attraction. (Alas, historic Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled here, in part, after building the railroad to Los Angeles. Los Angeles Union Station was then built on top of old Chinatown's rubble.) This explains why Union Station is about a mile from downtown when railway stations were traditionally located in the heart of downtown.

Response GO34-10 Refer to Section 2.0, Project Description, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment GO34-11 Furthermore, erecting the Esplanade water fountain while semi-desert Los Angeles is experiencing its worst drought in recorded history, flies in the face of the State of California's policy to lessen climate change. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what our Board believe's drives LA ART and the Esplanade Project. Or to paraphrase the immortal Yogi Berra, "It's 'Chinatown' (the movie) all over again." For the above reasons, but not necessarily only because of them, The LAUSHS Board of Directors has reluctantly voted to oppose construction of LA ART and LA Metro's "Esplanade Project."

Respectfully submitted,

Thomas R. Savio
Executive Director
Los Angeles Union Station Historical Society

Response GO34-11 Refer to Section 2.0, Project Description, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt. As described in Draft EIR Section 2.0, Project Description, page 2-49, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment Letter GO35 – Martha I. Jimenez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO35

Comment GO35-1 Dear Holly, Stephanie, and Metro Colleagues,

Attached please find our request for a 45 day extension of the minimum statutory DEIR comment period for the Gondola Project. For the reasons indicated, we believe such an extension is both justified and necessary to ensure that the public will have a meaningful opportunity to review, assess, and respond to what we expect will be extensive and voluminous reports related to the construction, operation, maintenance, financing and myriad environmental and community impacts of the proposed Gondola Project.

We appreciate your kind consideration and attention to this request.

Best regards,

Martha
Martha I. Jimenez
Executive Vice President / General Counsel/Secretary (Pronouns: She, Her, Hers)
The California Endowment

Response GO35-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period.

Comment GO35-2 Dear Ms. Rockwell,

On behalf of The California Endowment ("TCE"), we respectfully request clarification regarding the deadline for the Draft Environmental Impact Report ("DEIR") comment period for the Los Angeles Aerial Rapid Transit ("LA ART") gondola project ("Project" or "Gondola Project"). Additionally, for the below stated reasons, we seek a reasonable extension of 45 days over the minimum statutory comment period, so that the length of the comment period will be no fewer than 90 days.

Response GO35-2 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period.

Comment GO35-3 **1. <u>PREVIOUS EXTENSIONS HAVE BEEN GRANTED</u>**

There is precedent for such an extension for CEQA projects in Los Angeles.

■ In 2016, the City of Los Angeles extended the comment period for an additional 45 days for the South Los Angeles and Southeast Los Angeles Community Plan updates. (https :/ /planning.lacity. org/ eir/SouthAndSoutheastLA/FEIR/files/ 1. 0%20Introduction. pdf.)

■ This year, the Los Angeles Bureau of Engineering extended the comment period to 72 days for review of the Los Angeles Zoo Vision Plan. (https://eng.lacity.org/aboutus/divisions/ environmental-management/projects/los-angeles-zoo-vision-plan.)

A similarly complex project like the Gondola Project clearly warrants an extension.

Response GO35-3 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period.

Comment GO35-4 **2. <u>THE PUBLIC HAS NOT BEEN PROVIDED ADEQUATE INFORMATION</u>**

Even though the Project application was submitted four years ago, and the Notice of Preparation was released two years ago, publicly available information regarding the Project has been sparse. Community members remain unclear regarding of the details of the Project and its impacts.

We expect that a project like the Gondola Project-which is expected to cost over $100 million to build and will require construction of large structures in areas like the LA State Historic Park, Union Station, and along Alameda Street-will need to involve numerous complex technical studies. We also expect that complex technical greenhouse gas and transportation studies will be required to support LA ART' s claims of zero emissions and community benefits relating to traffic. Nevertheless, the public has been provided little to no information regarding these and other potential impacts to their community.

Furthermore, prior to the September 15, 2022, Metro Executive Management Committee Meeting, LA ART promised "updated project information, including construction and operation costs and funding and financing plan" on or before September 30, 2022. (September 15, 2022, Los Angeles Metropolitan Transportation Authority Executive Management Committee Board Report). To date, that information has not been made publicly available. Without this information, how can stakeholders be expected to be able to fully evaluate the Project, or community members be sufficiently informed to understand the impact the Project will have on their day-to-day lives?

Response GO35-4 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period.

Comment GO35-5 **3. <u>A 45-DAY EXTENSION IS REQUIRED TO ENSURE MEANINGFUL PUBLIC PARTICIPATION</u>**

The notice sent out via email to stakeholders on September 28, 2022, stated that the DEIR will be released on October 17, 2022, for public comment, but did not specify the length of the comment period. The minimum 45-day comment period for this DEIR is far too short, prevents meaningful public engagement and comment, and will likely significantly limit the participation of those who require language assistance.

While we cannot know what issues the DEIR will focus on, we expect the DEIR to be voluminous given the complex and technical nature of the Project. For example, the Notice of Preparation was non-specific in stating the potentially significant impacts. It generally states that the Project will "address all environmental topics listed in Appendix G of the CEQA Guidelines," and presents a list of all twenty topics, including aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and historic resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, wildfire. (October 1, 2020, Notice of Preparation; Cal. Code Regs., tit. 14, § 15082 (a)(l)(C).)

Response GO35-5 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public participation opportunities during the Draft EIR public review period. The format of the in-person public meetings immediately preceding, during, and immediately following, the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could

be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. Verbal comments made at the fourth, continued public hearing held on February 8, 2023, held as a continuation of the third public hearing due to disruptions at the third public hearing, were deemed timely submitted for the purposes of the Draft EIR public comment period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment GO35-6 As was previously mentioned, despite promises to the contrary, the public has yet to receive detailed information regarding the multitude of complex studies that will likely be needed for such a major undertaking as this multi-million-dollar Gondola Project. It would be unfair after repeatedly asking for this information for the last several years to give the public just 45 days to digest complex technical studies and attempt to understand their long-term implications. The public needs sufficient time to analyze such studies. Simply put, an extension of the comment period is warranted given the historic and continuing lack of information provided to the public about the Gondola Project.

Response GO35-6 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from

the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. Refer to Response GO35-3 for discussion of the opportunities for public participation during the Draft EIR public review period.

Comment GO35-7 Furthermore, public comment regarding the Project has already been stifled and it appears as if it will continue to be limited moving forward. On September 15, 2022, the Los Angeles Metropolitan Transportation Authority ("Metro") Executive Management Committee held a public meeting, during which the Project was presented. During the conduct of that meeting, public comment was limited due to a multitude of issues with providing interpretation services for members of the public who required language assistance and Metro cut off over 40 members of the public who were in the queue to provide oral commentary. [1] With regard to the DEIR comment period, Board Director, Supervisor Hilda Solis forcefully expressed the community's need for more comprehensive community commentary on the Project not just following the release of DEIR, but prior thereto. Likewise, Metro Board Director, Supervisor Janice Hahn, raised concerns regarding the Gondola's impact on Metro's current Free Dodger Express Bus system used by residents throughout the County. Metro has since posted "Community Information Sessions" on its website to "share details on the project", however, not one of the four sessions - two held just the week prior to the release of the DEIR and two the week after - allows for live oral public comment.

[1]Metro referred those who were unable to voice their concerns during the conduct of the meeting with an option to email their comments. Following the email option being stated as the sole option to provide comment, this failure to account for the potential lack of accessibility for all members of the community was noted.

Response GO35-7 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO35-3 for discussion of the opportunities for public participation during the Draft EIR public review period. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their

Metro fare at no additional cost under the Community Access Plan. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment GO35-8 The comment period is also occurring while the COVID pandemic is still making meetings and public accessibility difficult. According to the latest CDC data, community transmission of COVID-19 in Los Angeles County is "substantial." (https :// covi d .cdc. gov/ covi d-data-tracker/#county-vi ew?list select state= California&datatype=Community Levels&list select county= 6037&null= Risk [select data type "CommunityTransmission"].) It is well-documented that the COVID pandemic has heavily impacted lower income communities and communities of color, like the communities surrounding the Project site. Additional variants and a surge in COVID cases are expected this fall and winter. (https ://www .la times .com/ califomia/ story/2022-10-01 /new-coronavirus-subvariants-a-worry-forwinter-covid-wave.) Community members are only recently receiving updated booster vaccinations. Frequent COVID infections require isolation and rest, and much time is required to devote to taking care of health issues and recovering from COVID and Long COVID, so expecting public attention and review of the DEIR during this period is unreasonable. A 45-day extension would be reasonable and help to ease the impacts of the COVID pandemic on community engagement.

Response GO35-8 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO35-3 for discussion of the opportunities for public participation during the Draft EIR public review period.

Comment GO35-9 Lastly, it is unreasonable to expect public comments on such an extensive document in a 45-day period that straddles important family holidays including Thanksgiving (on November 24, 2022) and December holiday season. TCE's requested 45-day comment period extension would conclude the comment period after the winter

holiday season and allow the public to have sufficient time to meaningfully review, assess, and respond to the DEIR.

Please confirm that you have received this request, and we hope that you will respond favorably. Given the above-mentioned factors that are impeding the public's review, a 45-day extension of the minimum comment period is clearly justified in this instance. Public participation, a key component and pillar of CEQA, will be substantially improved with additional time and thus an extension would be much appreciated.

Response GO35-9 Refer to Response GO35-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO35-3 for discussion of the opportunities for public participation during the Draft EIR public review period.

Comment Letter GO36 – David Carle

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to GO36

Comment GO36-1 Dear Ms. Rockwell,

I'm writing on behalf of the California State Park Rangers Association (CSPRA) to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response GO36-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment GO36-2 As this project will impact the Los Angeles State Historic Park, the public deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response GO36-2 Refer to Response GO36-1 for a discussion of the Draft EIR's 90-day public review period. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the

purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment GO36-3 We have not received information on important details of the project and will need sufficient time to review and understand it.

Response GO36-3 Refer to Response GO36-1 for discussion of the Draft EIR's 90-day public review period. Refer to Response GO36-2 for discussion of opportunities for public participation during the Draft EIR's 90-day public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings.

Comment GO36-4 A 45-day extension to ensure proper community engagement is necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please extend the comment period by 45-days to give our organization and other interested parties an opportunity to review and participate after the holiday season.

Sincerely,

David Carle

California State Park Rangers Association President
dave@cspra.com
760 709-1181
PO Box 39, Lee Vining, CA 93541
www.cspra.com

Response GO36-4 Refer to Response GO36-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response GO36-2 for discussion of the opportunities for public participation during the Draft EIR's 90-day public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings.

Section 6.3.3 Responses to Public/Individual Comment Letters

Comment Letter P1 - Topher T. Hendricks

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P1

Comment P1-1 Longtime Metro-rider / enthusiast and downtown property owner here. As someone who lives within blocks of Union Station, I am your prime target for being a regular gondola-rider. I almost always take the Dodger Express to the games. The shiny renderings of the gondola are fun and futuristic, but I am shocked at how this project seems to be moving forward without any consideration at all to cheaper, more effective, longer-lasting, simpler, easier-to-maintain solutions.

Response P1-1 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options for a discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA, and how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities. Refer to Section 2.0, Project Description, of the Draft EIR for an overview of routine maintenance activities for the proposed Project and how the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Comment P1-2 The extremely-obvious Occams Razor solution to anyone who isn't just a politician hoping for a photo op that you have been ignoring is a simple sidewalk. Certainly not a perfect solution, or an elegant one, but the fact that a gondola is being discussed AT ALL before the simplest, more pure, cheapest transportation solution exists to the stadium is a joke. The current sidewalks to the stadium are deathtraps, ending abruptly, or going comically so far out of the way that it feels like the city is intentionally punishing anyone who decides to walk. To go from downtown to Dodgers Stadium on foot is currently a cruel experience. How is there not even just a single set of stairs from Lookout Drive to the stadium that is barely a few feet away up a hill? Instead you're forced to go nearly a mile out of your way on an extremely dangerous route (especially if traveling with children).

Response P1-2 As discussed in Section 2.0, Project Description of the Draft EIR, the proposed Project proposes the development of an aerial gondola system to connect LAUS to the Dodger Stadium property. As there is no direct transit option to the Dodger Stadium, the proposed Project would provide one while overcoming grade an elevation issues related to the location of the Dodger Stadium property compared to the surrounding

communities and neighborhoods. As stated in the comment, while pedestrian connections exist from nearby neighborhoods to the Dodger Stadium Property, the proposed Project would provide a means of transit to individuals unable to overcome the grade and elevation changes on foot. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P1-3 Don't even get me started on the lack of protected bike lanes. It would be a golden opportunity to get new riders to experience the electric bikes of the Metro bike fleet if there were docks at the stadium and convenient & safe protected bike lanes from downtown or at least to Sunset Blvd. (Plus in combination with protected lanes down Sunset Blvd would also help cut down on traffic to/from the stadium, especially for locals)

Response P1-3 As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The proposed Project cabins would allow for sitting and standing as well as bicycles.

Comment P1-4 Look at the baseball stadiums that have stood the test of time in our country, like Wrigley and Fenway. These are supremely walkable stadiums, with bars, restaurants, & housing a mere stones throw away. Los Angeles has MUCH better weather for walking around all year, so we deserve a stadium that embraces what makes this city so great. Allowing people to safely and conveniently walk & bike to the stadium would help local businesses thrive, as people get to experience the neighborhood instead of just flying over it in a cramped box after stressfully waiting in long lines. People could get to the stadium earlier, and hang out later, rather than trying to rush in & out because they feel like they have to.

Response P1-4 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P1-5 Metro struggles with funding all the time; a quick glance at our shadeless bus stops, or our dismally infrequent & filthy subway (I say this as a daily rider, metrobike annual pass holder, and huge supporter for the potential our system has), and it is insane to think Metro will be able to keep up the necessary maintenance for a gondola, when a simple sidewalk and a flight of stairs would get so many people up to Dodgers Stadium so much more efficiently (in terms of nearly every metric, like energy, cost, time, labor, etc).

Response P1-5 Refer to Response P1-4 for discussion of a Pedestrian Enhancement Alternative to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine.

Comment P1-6 Properly accessible sidewalks (and protected bike lanes with Metro bike docks) are the first step towards making Dodgers Stadium the world class experience that LA deserves, at a fraction of the cost of the gondola, and comparatively require little-to-no-maintenance. I'm not saying a flat-out no to the gondola, but come on. Do the easy obvious stuff first that has been proven to work and then go from there. Lets focus on REAL solutions that will last before we get to the gimmicks.

Response P1-6 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments contained in this letter are provided above in Responses P1-1 through P1-5.

Comment Letter P2 - Bert Glatstein

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P2

Comment P2-1 1) Who are the principals behind LA Aerial Rapid Transit Technologies LLC

Response P2-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P2-2 2) who much public money has been expended to date on this project

3) How much public money will be expended in the future

Response P2-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P2-3 4) who is paying for the right of way for this project

Response P2-3 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P2-4 5) what contingencies are being made for in the event of LA Aerial Rapid Transit Technologies LLC declaring bankruptcy (particularly given the history of Frank McCourt)

Response P2-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P2-5 6) would this fare required system be used more frequently than the free Dodger Express

Response P2-5 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment P2-6 7) How would the so called 'improvements' to LA Historic Park affect current park usage

Response P2-6 As discussed in Section 2.0, Project Description, of the Draft EIR, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Section 3.16, Parks and Recreation, of the Draft EIR. The proposed Project would result in less than significant impacts to parks and recreation.

Comment P2-7 8) Has there been any study to compare cost effectiveness of this project versus adding lighting and sidewalk improvements from Dodger Stadium to Chinatown Station

Response P2-7 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P2-8 9) Does the 5000 per hour ridership account for waiting times at either end

Response P2-8 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. Due to the nature of queue formation, the pre game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations. In addition, post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

Comment P2-9 10) Other than 81 Dodger games per year what is the anticipated usage

Response P2-9 Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The

proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan.

Comment P2-10 11) does the 1 mph speed at stations accommodate ADA passengers

Response P2-10 Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. The station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Comment P2-11 12) Proposed fare

Response P2-11 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P2-12 13) Cost comparison between TSM Alternative and LA Aerial Rapid Transit Technologies

Response P2-12 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities.

Comment P2-13 14) what effect would the construction and operation have on area residents?, would payments have to be made and if so who would be liable

Response P2-13 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration. As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support Program during construction. Refer to Section 3.17, Transportation, and Section 3.11, Land Use, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would implement a Construction Traffic Management Plan that would include detours and ensure that emergency access is maintained throughout all construction activities.

Comment P2-14 15) How much money has Frank McCourt contributed to city officials Thank you for your consideration of these questions

Response P2-14 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P3 – Israel Vasquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P3

Comment P3-1 I am reaching out as a concerned citizen, and I do not support the Gondola.

First and foremost, this is not the most efficient and rapid solution. We either need a tram system that connects directly or nearby the Union Station or establish a dedicated BRT to bring folks to the stadium.

There are several real-world solutions that can benefit the community and local businesses.

Response P3-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project is an aerial rapid transit gondola system connecting LAUS and Dodger Stadium. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter P4 - Riley McNair

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P4

Comment P4-1 As a member of the UCLA community, the gondola is a public transportation failure with a low capacity of 5000 per hour. We must strive to to do better.

Response P4-1 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P5 - Jack Humphreville

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P5

Comment P5-1 How is the Gondola project going to financed?

Is the metro or the public a source of funding?

Response P5-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P6 - James Martin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P6

Comment P6-1 I am completely opposed to this project as designed.

Response P6-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P6-2 Please don't build this across LA State Historic Park. It will definitely mess up a complete jewel of a park for the city.

Response P6-2 Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.156, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment P6-3 People hate the gondola idea. It should be stopped now.

Response P6-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P7 - Alexander M. Kargher

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P7

Comment P7-1 Dodger's Stadium and ostensibly the parking lot owners have done little to nothing to improve access to the stadium for people who do not wish to drive. Every time I bike to the Stadium I am met with fewer and fewer places to park my bike. The pedestrian infrastructure around the stadium is poorly maintained and intersects with huge volumes of vehicular traffic once you get on site. If the City effectively enforced the bus only lanes on Sunset then the buses would work.

Response P7-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities.

Comment P7-2 It would be pretty easy and cost effective to make it safer to get to Dodger's Stadium without driving. Improving walking access and upgrading the parking lots to accommodate pedestrians and bikes and buses over private passenger cars is inexpensive. But instead of doing any of these things, the proposal is to build a gondola. This is not "Field of Dreams". If you build it, the multimodals / carbon neutral folks won't come.

Response P7-2 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P7-3 Not only is this proposal incredibly expensive and highly engineered, but the long term maintenance costs apparently are irrelevant. And this is all before you consider the impact this will have on one of the best greenspaces near DTLA and the surrounding community in Solano Canyon.

Response P7-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park and Solano Canyon. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P7-4 At bottom, the City should use its resources (and so should the Dodger's and McCourts) to improve the existing infrastructure before it disrupts everything on this quagmire.

Response P7-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response P7-3 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment Letter P8 - Margaret Light

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P8

Comment P8-1 If this is to be ZERO EMISSIONS and running EVERY DAY, what is the power source?

If the power source is ELECTRICITY, then it can not be zero emissions. We already are short of power in the LA area (rolling brown/black-outs) so our electricity still comes from burning coal and other fossil fuels even if outside of California.

Response P8-1 Refer to Section 3.06, Energy, of the Draft EIR, for discussion of the proposed Project's electricity demand. As discussed on page 2-47, in Section 2.0, Project Description of the Draft EIR, the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. When operating at capacity, normal operations are estimated to require a total of approximately 2.5 megawatts of power. Electrical power associated with proposed Project operation would primarily come from renewable resources. Further, as discussed on pages 2-48 and 2-49, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would incorporate sustainability features to lower energy demand, including, open-air station boarding platforms with natural shading and ventilation, energy efficient LED or low voltage lighting fixtures, energy efficient glazing, where it occurs, use of LADWP green power sources, and backup power provided by battery storage as opposed to diesel generators.

Comment P8-2 If the point is to reduce parking congestion, where will the 5,000 people (per hour) park at the "origin" of their trips. Are you not just moving the congestion from dodger stadium to outlying areas (which will create their own problems?).

Response P8-2 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in

traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to a proposed Project's stations. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[1] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P8-3 I'm not sure what problem this solves, and am NOT in favor of it at the moment.

Since it was an UNSOLICITED bid request, I would like to "follow the $" to see who stands to benefit from this.

Response P8-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

[1] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Comment Letter P9 - Aram Hacobian

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P9

Comment P9-1 I don't believe this project is necessary although it would be cool if it was built.

Response P9-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P9-2 Gondolas don't carry nearly as many passengers per hour as buses do and I think the best option is to have exclusive bus lanes for the Dodger Stadium Express for home games or better yet, relocate Dodger Stadium to somewhere more transit accessible.

Response P9-2 As discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would carry up to approximately 5,000 people per hour per direction. Refer to Topical Response H, the Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to pages 4-62 and 4-72, in Section 4.0, Alternatives of the Draft EIR, for a discussion of how in the TSM Alternative, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium. Bus-only lanes could also potentially be provided in both directions on Sunset Boulevard and Cesar E. Chavez Avenue. While this would expedite Dodger Stadium Express service (both for the existing Dodger Stadium Express service as well as the Transportation Systems Management Alternative), this would also increase traffic congestion.

Comment Letter P10 - Brian VanRiper

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P10

Comment P10-1 Seems like a cool idea. Will this really tie together a few metro stations and lines, with dodger stadium?!

Response P10-1 As stated in Section 2.0, Project Description of the Draft EIR, the proposed Project would provide a direct connection from the Los Angeles Union Station to the Dodger Stadium. LAUS provides local and regional access via multiple modes of transport and service providers, such as Metro, Metrolink, Amtrak, and municipal and private bus operators, all of which converge at the station. There would be an intermediate station at the Chinatown/State Park Station located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. In addition, the Chinatown/State Park Station is a 3-minute walk to/from Metro's L Line (Gold) Chinatown station.

Comment Letter P11 - Rachel Orfila

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P11

Comment P11-1 I'm writing in support of the proposed gondola to Dodger Stadium. I think this would be a wonderful way to reduce carbon emissions and give fans another car-free option to get to games. Traffic congestion before and after games is a big problem, and I think the góndola would give fans a great incentive to get out of their cars! I also think it would be a fun addition to the neighborhood, for both tourists and locals.

I really hope this project moves forward quickly. I look forward to riding it someday soon!

Response P11-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P12 - Jean Albrick

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P12

Comment P12-1 Too vulnerable to Crime, Fire, Weather threats.

Response P12-1 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. As discussed in Section 3.15, Public Services, Section 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts related to fire protection services and wildfire. The proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts.

Comment P12-2 ...Please preserve the nostalgic aura surrounding Dodger Stadium!

Response P12-2 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P12-3 ...Redundant, and an unnecessary mode of LA transport.

...Baseball here, NOT Disneyland!

Response P12-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments.

Comment Letter P13 - Jack Reed

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P13

Comment P13-1 As residents of Angelino heights, we love the idea of the gondola. We cannot continue to allow NIMBYS to hold progress back. Build the gondola!

Response P13-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P14 - Charles W. Ben

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P14

Comment P14-1 I am a resident of the 90012 zip code and frequent Metro rider. I am sending this email to leave a comment in opposition to the Doger Stadium gondola. It is not an efficient solution to the stadium traffic and will disrupt the area of the state park it crosses.

Response P14-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P14-2 I also have concerns about rising rents in the area.

Response P14-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P15 - Tanner Vandenbosch

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P15

Comment P15-1 I have some concerns with the project that I wanted to share.

The Draft EIR states that the system would have capacity to transport 5,000 people per direction per hour, but is this realistic in LA, especially with its principal purpose transporting people to baseball games (families with small children, people drinking, etc,) and with what seems to be comparatively slow boarding on the Metro Rail system relative to other cities already?

Response P15-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment P15-2 Would capacity be sufficient to get people to Dodger's games without severe overcrowding, especially after games? How would it manage crowds over an extended wait time? Also, how would concerts and other events be managed?

Response P15-2 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter duration. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield

Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

Comment P15-3 -Is there firm evidence that the project would reduce VMTs? Is Metro studying the potential that people drive to ride it as a tourist attraction given the views from it?

Response P15-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P15-4 -How is the project addressing concerns it will drive gentrification in Chinatown?

Response P15-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P15-5 Will a station in the community actually have any net benefit for residents, given the L line (soon to be A line) has a nearly identical route already in service with better connection to more destinations?

Response P15-5 Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a

stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan.

Comment P15-6 -It seems more engagement with the Chinatown community is necessary and the community should have more of a say.

Response P15-6 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Commitment to Community Benefits, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P15-7 -Why has Metro not considered non aerial tram alternatives, like a future extension of WSAB light rail or improving the existing shuttle system, to meet the needs of the community? Its construction should not preclude a more efficient, effective, and lower-cost transit option for riders to Dodger stadium.

Response P15-7 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and

businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment P15-8 -No public money should be spent on the project. The project seems to have nearly no benefits for regular transit riders in LA County and that money would be better spent on other transit improvements, and Metro should consider an option that takes equitability better into account.

Response P15-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project supports Metro's goal of prioritizing equity opportunities and helps promote public transit as an essential lever in enabling access and improving quality of life for Los Angeles County.

Comment Letter P16 - Michael Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P16

Comment P16-1 What a great idea and a signature attraction for Los Angeles! Please do it… right into the stadium if possible!

Response P16-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P17 - Lynn Miller

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P17

Comment P17-1 I support anything that will reduce the congestion in and near downown LA. The gondola to Dodger Games will help Dodgers fans and everyone else who gets caught in game traffic.

Response P17-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P18 - Joshua Rangel

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P18

Comment P18-1 The success of the aerial Gondola would be an incredible milestone, I truly wish for the reduction of red tape which leads to the obstruction of the success of this aerial gondola. I believe this will benefit the local fan, the last minute planner, the LA fan visiting from outside of town. This would be an incredible addition to the city and reduce carbon emissions from the dodger express that the busses produce.

Traffic reduction as well.

This is key. I hope this happens and I hope we can make more marvels to downtown Los Angeles.

Let's get a WS next year! Thank you for your time, I hope we can make this work, cheers

Response P18-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P19 - Mark Staples

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P19

Comment P19-1 I would like to submit these comments on the proposed gondolas to Dodger Stadium. This project is not needed in any way shape or form. There is a very limited to no need or use of this gondola system from October to March of each year when there are no home games. Remember there are only 81 home games from April to September.

Response P19-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P19-2 There are only 3 stations, which serve no one other than Dodger Stadium guests. This doesn't solve any transit issue or transit need in any functional or convenience manner. One thing this project does prove is that the next subway or light rail line should go by Dodger Stadium the northward under or on Sunset Blvd. As the red and purple lines service Hollywood and Wilshire Blvds, this new subway or light rail could travel westward along Santa Monica or Melrose.

Response P19-2 Refer to Response P19-1 for discussion of the need for the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P19-3 In the end this gondola project is a NO for me. I am a Dodger fan and have no need to use it to attend a game.

Response P19-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P20 - Ding Kalis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P20

Comment P20-1 Great idea if the Dodgers pay for it!

Response P20-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P21 - Sarah Back

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P21

Comment P21-1 I live in district 1 and am opposed to this project. There are already public transit options to get to Dodger stadium - and we are in such desperate need of more transit all over the city. This feels like a pet project instead of a huge impact transit investment.

Response P21-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P22 - Nick

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P22

Comment P22-1 I am writing in SUPPORT of the aerial tram concept from the LA Metro rail line to Dodger Stadium. The concept is an emission-free way to safely transport passengers to and from games. More importantly, it is a an opportunity to utilize a new mode of transportation in Los Angeles that could have positive applications in other circumstances. Los Angeles needs to reduce its over reliance of car transportation.

Response P22-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P23 - Chase Paules

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P23

Comment P23-1 I would like to express my support for this project, and that it should be built. Reducing car dependency and expanding non-car options for getting to and from Dodger Stadium are important goals for this city.

Response P23-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P24 - Stephanie Pincetl

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P24

Comment P24-1 It would be good to have a pedestrian pathway up to Dodger Stadium.

Response P24-1 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment Letter P25 - Neil Larsen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P25

Comment P25-1 I am a resident of Los Angeles County, and a life long Dodgers fan. Unfortunately, due to excessive traffic and congestion at and around Dodgers stadium, I have not attended as many home games as I would have liked to within the past few years.

Response P25-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P25-2 I am in support of the proposed gondola system, as it offers a more convenient (and presumably enjoyable) means of traveling to a game.

Response P25-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P25-3 I understand that not all local residents in the surrounding neighborhoods are in support of the proposed gondola; however, there are only 81 homes games during the baseball season and I'm sure certain measures could be put in place to minimize the impact/concerns by local residents.

Response P25-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P25-4 The gondola systems is a win all around in my eyes. It will alleviate the traffic problems to Dodger stadium, enhance the experience, and be something the next generation of fans can enjoy.

I support the project and hope that it will be approved.

Response P25-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P26 - Matt Schodorf

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P26

Comment P26-1 I am an LA resident, I frequent Dodger games, and I think the gondola is a great idea.

Response P26-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P27 - David Fried

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P27

Comment P27-1 I'm sure you guys usually only hear from the complainers, but believe me there are WAY more who are for it than who are against it.

Response P27-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P27-2 This would not only be a needed boost to public transit, but also a fun and unique draw for tourism.

Please forward my thank you to whomever is working on making this happen.

Response P27-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P28 - Michael Bauer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P28

Comment P28-1 I missed the informational hearing that was held via zoom last Saturday. Was the meeting recorded and is there a link where I can view it?

Response P28-1 Materials presented at the informational meetings, along with recordings of the October 22, 2022 informational meeting, are available on the proposed Project's SB 44 website.[2] Refer to Appendix B, Public Hearing Transcripts, of this Final EIR for transcripts of the public hearings.

[2] Refer to Remainder of the Record Category at https://laartsb44.net/#!/documents.

Comment Letter P29 - Yasmin Grewal-Kok

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P29

Comment P29-1 I live in Atwater Village, near Dodger Stadium and am 100% against building this Gondola. It is not needed, will be an eyesore, and will negatively impact the environment and natural habitats.

Response P29-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how the proposed Project would have less than significant impacts to biological resources.

Comment Letter P30 - Mark Whitney

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P30

Comment P30-1 Don't we all know the story of the Chavez Ravene? How it was stolen from it's Hispanic residents with promises (and funds) to build public housing. Then the old bait and switch and it became Dodgers stadium.

Do you honestly plan to do this again, with promises of a Metro sky car only to create a tourist attraction that would spoil the area with overhead wires, that only benefit a few Dogers fans and corporate owners?

Response P30-1 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P30-2 I suspect whoever is trying to barrel this through is a big Caruso fan. Maybe it's Rick himself. How many Dodgers home games are there is a year? I know traffic sucks when they happen, but haven't we learned to deal with it? It's not like the Stadium is getting any bigger.

Response P30-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition,

the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P30-3 I am 100% against this project. It benefits nobody but the greedy business entities which are proposing it and the politicians who readily accept their campaign contributions.

Response P30-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P31 - Samantha Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P31

Comment P31-1 Would this service replace the existing services already available to get to dodger stadium?

Response P31-1 Funding sources for Dodger Stadium Express are not known beyond the 2023 season, but the proposed Project would not preclude the continued operation of the Dodger Stadium Express, which would provide further transit capacity to Dodger Stadium. Despite the slower travel time, some riders may prefer to continue riding the service. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment P31-2 Instead, why not offer more carts at Dodger stadium to assist those walking up that super big hill or getting from entrance to entrance. If it?s not broken, leave stuff alone!

Response P31-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how, while there are some game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on the proposed Project, and the path would be on a steep downward grade which does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P31-3 There are already plenty of ways to not drive to Dodger stadium. Use that money to avoid further gentrification in all our LA communities! Housing! Something useful since there?s money to be spent

Response P31-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment Letter P32 - Kyle Martin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P32

Comment P32-1 I am a resident of the Mozaic apartments at union station and I support the Dodger stadium gondola.

Response P32-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P32-2 I see no way that the 3 stations at union station, Chinatown gold line station, and Dodger stadium could gentrify the small area in between; two of them are already rail stations and the other will be in the stadium parking lot! And as much as I love Chinatown, that neighborhood needs some investment, and the gondola could actually boost tourism to the area. And tbh, I wouldn't mind seeing more of the new higher density mixed use buildings that have been built there recently (and they even have tasteful design honoring Chinatown's traditional aesthetic), as long as long-time independent businesses are not pushed out.

Response P32-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P32-3 If we've learned anything from the wild opening of the new 6th street viaduct, it's that Angelenos are starved for for inspiring new public infrastructure. The bulk of that should absolutely be in the form of parks and other green spaces (the gondola will actully add to the experience at LA historic park, one of our best), but just as the 6th

st bridge has already become an iconic part of the city, I think the gondola will be that and more.

Response P32-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P32-4 The gondola can be something aspirational, inspirational, and yet also practical. I love the dodger express. But it took an hour in line just to board last time I rode and another 15 mins or so to drive up. The gondola can help relieve congestion in the buses and in traffic while making for a memorable experience unmatched by any sports stadium, and befitting a crown jewel like Dodger Stadium. And it's zero emissions to boot!

Response P32-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P32-5 Short of some major safety, environmental, or ethical concern, I see no reason why the gondola should not be built to help make this great city just that much greater.

Response P32-5 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment Letter P33 - Robert Smolkin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P33

Comment P33-1 The idea of gondolas transporting fans to and from Dodger Stadium by rising above the streets and traffic is an innovative and imaginative solution! I applaud all those who are spearheading this project and strongly encourage City leaders to green light this solution.

Those critics who insists the existing shuttle bus program makes this new solution unnecessary overlook how the buses continue to contribute to street level congestion, air pollution and gasoline consumption.

Count my vote as a YES.

Response P33-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P34 - Steve Cokonis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P34

Comment P34-1 Looking forward to this being built! Currently commute from Cypress park to Culver City and traffic is horrible during dodger games!

Praying this gets built!

Response P34-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P35 - Neal Roscoe

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P35

Comment P35-1 Please count this Los Angeles resident as in favor of the gondola to Dodger Stadium. I think this is a great option to add to all ways to reach the Stadium. Not only might it entice more people to take public transportation to games and concerts (people who for whoever reason don't currently use the shuttle busses, etc.), but it just might be a great tourist attraction in itself.

Lets give it a try.

Response P35-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P36 - Tami Kagan-Abrams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P36

Comment P36-1 I am very much in favor of a gondola to Dodger Stadium. I tried to go to Dodger Stadium for the first time in over 10 years for the Fluffy show this summer. It took 90 minutes to arrive and park (which was $40) from when I left Hollywood, and even though we left before the show ended, it was still a nightmare to get out. I vowed never to return.

Response P36-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P36-2 Going there should be one of LA's best experiences, not one of its worst. The bus is not helpful, because it's stuck in the same automotive traffic but takes away your control of when you want to leave. If I could take the Metro Red Line to Union Station and the the gondola, the process would be lengthy but low cost and hopefully relatively painless. I can't believe the residents around the stadium who currently endure hours and hours of epic traffic and the loss of all available parking find the status quo acceptable.

Response P36-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P37 - Grant Blakeman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P37

Comment P37-1 I truly do not understand why Metro is allowing itself to be distracted by this project. A gondola itself is not a bad idea in some situations, but for a sports arena it will never be able to serve at the capacity/volume necessary within a game-day timeframe to put a meaningful dent in traffic reduction, carbon emissions, or access that a public transportation project should consider.

Response P37-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd).

Comment P37-2 Gondola projects that are actually successful connect population centers where demand and volume can be spread over hours and service can equitably be provided to all members of a community.

Response P37-2 Refer to Response P37-1 for an overview of the need for the proposed Project. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed

Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P37-3 While I like the idea of non-game-day park access, for this aspect of the project to be even remotely considered a win for the entire community of LA, it would need a commitment of no fare or a low-fare commiserate with riding a train/bus (with free transfers). This fare should not fluctuate or change depending on who is trying to access the park. In LA we should provide transit options for all (including visitors).

Response P37-3 Refer to Topical Response N, Environmental Justice, for a discussion of the Community Access Plan. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Moreover, under the Community Access Plan, transfers to and from the Metro regional transit system and the proposed Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.).

Comment P37-4 Ultimately, this is a vanity project for the owner of some Dodger Stadium parking lots and the Dodgers organization itself, at best. At worst it is an abuse of public funds (and a public park, no less) to fund a private tourist attraction.

Response P37-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous

Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment P37-5 Other projects Metro should implement long before considering this gondola project:

* Protected bike lanes from Dodger Stadium all the way to the ball field

* Increasing Metro Bike's e-bike fleet and making them available on game-day

* Closing most (all?) roads throughout the park to cars at all times

* Stairs (maybe even escalators) for better pedestrian access to both the park and the stadium

* Putting in a permanent bus lane (separate and in addition to the protected bike lane) between both Union Station and the stadium

* Free, frequent bus shuttle service into and around Elysian Park to serve both Dodger games and, more broadly, the park itself at all times

Response P37-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger

Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P38 - Matthew Mier

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P38

Comment P38-1 I support this project as long as public funds are not used to build it. It is important to provide non driving fans multiple options to get to Dodger Stadium. As someone who regularly uses the Dodger Stadium Express, I can appreciate how useful it is. It is clear there is a demand for more options as the Dodger Stadium Express often has long lines.

Response P38-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment Letter P39

This comment number has intentionally been skipped.

Comment Letter P40 - Abe Ahn

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P40

Comment P40-1 Dear Metro,

I am a Los Angeles resident who opposes the LA Art gondola plan to Dodger Stadium.

While I support innovative alternatives to private automobiles and road traffic in the city, this sounds like the worst kind of boondoggle and grift disguised as public-private partnership.

First of all, being one of the most rapacious and miserly private landowners in the city, Frank McCourt is not a reputable figure. He should not get to influence and impact public spaces for communities of color like Chinatown in ways that would most benefit his private business interests.

Response P40-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community, including in Chinatown.

Comment P40-2 Drew McCourt and Aerial Rapid Transit Technologies LLC may have the benefit of the elder McCourt's funding, but I believe that other firms should get to propose better, more sustainable alternatives that actually meet the needs of city residents (particularly those who are most vulnerable to displacement and dispossession by development projects like the gondola).

The gondola is a short-sighted Mickey Mouse solution that will benefit tourists, the Olympics, and most of all the McCourt family -- NOT the daily lives of everyday Angelos. Please do not let this project happen.

Response P40-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment Letter P41 - Perrin Shannon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P41

Comment P41-1 Dear LAART,

As a long-term Los Angeles resident, I am thrilled to see the city considering such visionary urban transit options as the LAART for our world-class city. The gondola would be a fantastic resource to help expand mobility options in an area desperately in need of traffic relief. This is a project that will benefit local residents as well as attract tourists to a wonderful area of our city. Please push this forward! Los Angeles is in need of more innovative projects such as this!

Response P41-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P42 - Carleigh Shannon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P42

Comment P42-1 I am writing on behalf of the LA ART. As a long-term Los Angeles resident, I am thrilled to see the city considering such visionary urban transit options for our world-class city. The gondola would be a fantastic resource to help expand mobility options in an area desperately in need of traffic relief. This is a project that will benefit local residents as well as attract tourists to a wonderful area of our city. Please push this forward!

Los Angeles is in need of more innovative projects such as this!

Response P42-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P43 - Katharina Schmitz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P43

Comment P43-1 We are writing to express our support for the proposed aerial gondola system connecting Union Station and Dodger Stadium. This project represents an opportunity for Los Angeles to become a leader in urban ropeway transit in the United States, and provide an example to other cities of new types of technologies that can be deployed to help reduce emissions and encourage transit ridership.

Doppelmayr reviewed the Alameda Station to Dodgers Stadium alignment early in the planning process to verify both feasibility of the project and the qualifications of the current project team. We are confident that not only is LA ARTT's proposed gondola system realistic, it is the best possible solution for the transportation challenge to Dodger Stadium. Aerial ropeway systems were originally designed to operate in harsh mountain environments but now have successfully proven their application as urban transit worldwide. A recent installation in Mexico City is testimony to this as well as our "soon to be constructed" gondola in Paris. Other examples around the world demonstrate the successful use of gondola systems in the urban environment.

Doppelmayr is the leader in aerial transport technology and our USA subsidiary is located in Salt Lake City, Utah. We employ more than 200 people in various disciplines including sales, engineering, technical support, fabrication, construction, and logistics. Our SLC team is an integral part of the Doppelmayr / Garaventa group with more than 3,000 employees worldwide. To date, Doppelmayr / Garaventa has built more than 15,100 installations for customers in 96 countries. We are committed to providing the best transport solutions now and for the future and would gladly share data from our extensive portfolio of projects as a reference.

Among Doppelmayr's proudest associations is our partnership with the Olympic Games. Los Angeles' future is bright with the reality of hosting another Summer Olympic Games in 2028. While we have provided many aerial systems for the Olympic Games (chairlifts, trams, gondolas, etc), in particular we wish to point out a unique 3S gondola system which was installed for the Sochi Olympics. The organizers faced a challenge in the requirement for providing constant access to competition sites. Much like the Dodgers Stadium, the venues in Sochi lie in an elevated location with a congested access road. The organizers looked to Doppelmayr to provide an innovative means of transport. The 3S system was selected to solve this complex issue, and the system was designed to move people quickly and efficiently. A similar gondola from Union Station to Dodgers Stadium with an intermediary station, would complement and strengthen the transit requirements for Los Angeles Olympic traffic plan.

Finally, and most importantly, the public will benefit most from the gondola solution. When it comes to passenger experience, neither buses, trains, nor automobiles can compare with that of a modern 3S gondola. Continuous cabin movement eliminates the frustrations associated with conventional mass transit waiting lines. After an easy boarding process, the passengers will enjoy a spacious and comfortable gondola cabin with access for all. The smooth flight over the streetscape allows for taking in the breathtaking views through floor to ceiling panoramic windows. Additionally, and perhaps most significant, the gondola system is extremely environmentally friendly. Within the lifecycle of the system, the operational phase is practically "zero" carbon neutral. A study demonstrating the operational efficiencies of a gondola system can be made available upon request.

In closing, we at Doppelmayr look forward to collaborating with LA ART on this exciting project. We remain available and ready to support.

Response P43-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. This commenter, Doppelmayr, is one of two manufacturers of 3S gondola systems in the world, and Metro and the Project Sponsor appreciate the company's support for the proposed Project.

Comment Letter P44 - Darren Howell

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P44

Comment P44-1 I am in full support of the Aerial Rapid Transit Project. We need creative, clean energy transportation solutions like this. I will attend one of the meetings and show my support.

I also wanted to help support the project by performing at the Grand Opening Celebration when it happens. Please put my name and contact information in your files for when you need it. This will be one less thing you need to plan/worry about.

Response P44-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P44-2 My LA-based band, Acoustic Generation, performs a unique, one of a kind immersive musical experience - "Captain Flashback's Laurel Canyon Love! - Celebrating the '60s/'70s Roots of Classic Rock." It's the best bands and songs from our own legendary music scene, go-go dancers, incredible 3 & 4 part harmonies, a fun peace & love vibe with clean lyrics - crowds of all ages sing and dance along to our show.

Classic Rock appeals to the widest demographic and the good feeling, peace & love vibe will be the perfect LA energy for your Grand Opening event.

Acoustic Generation performs in Hollywood and many other venues including the LA Zoo's "Lights Event," the Green Oasis Private Event at Coachella 2016, the HopCourage Beerfest at the LA Coliseum, "Breakfast with the Beatles" on 95.5 KLOS, "Earthfest Los Angeles" sponsored by California Greenworks, the Lexus Ventura Marathon, the Whisky, Roxy, Viper Room, Boardner's, House of Blues Anaheim and many more.

Here are 2 reviews -

"I had Acoustic Generation perform live on my show and they were FAB! Book "Laurel Canyon Love" as we all need more peace & love."

~ Chris Carter, host 95.5 KLOS "Breakfast with the Beatles"

"A MUST SEE SHOW! I loved the crowd engagement, beautiful harmonies and great set list. The peace & love vibe blew my mind!"

~ Mimi Chen, dj 88.5 KCSN "Peace, Love & Sundays"

Attached is our show logo and reference letters from large corporate events with thousands of guests.

We also organized, hosted and performed the LA Climate Change Concert at the Whisky in 2016. This sold-out event was a huge success and LA Mayor Eric Garcetti gave us a Certificate of Appreciation for our service to the city.

We would like to continue our service by performing at the launch celebration party for your great project.

Best wishes, Darren Howell

Acoustic Generation

Captain Flashback's Laurel Canyon Love! 323.383.8952

Dear Darren,

I wanted to say thanks again for performing at the Lexus Ventura Marathon. I asked Acoustic Generation back again this year because you guys are great to work with. You show up on time with great attitudes, and you put on a great show for our audiences.

Plus you are great about being flexible as something always seems to come up at these large events.

Our events are all ages and require professional entertainment with wide appeal. Acoustic Generation has great original songs, a fun Classic Rock show, and everyone loved the steel drums - there is really something for everyone.

I highly recommend Acoustic Generation to any event coordinator/Corporate planner, and I look forward to having you perform at more of our events in the future.

Thanks again.

Jen Livia

Expo Coordinator

Mile26 Events

805-827-1095

1450 E Thompson Blvd

Ventura CA 93003

To Whom It May Concern,

I am writing to strongly recommend that Acoustic Generation be added to the Musicians Roster of the LA County Arts Commission.

I organize the EarthFest LA Festival, an annual event that includes booths for green companies and organizations, food booths, speeches, entertainment, etc. I met Darren Howell and Acoustic Generation through one of his other concert events, and

I immediately knew that I needed their band and Darren to be a part of my 2015 EarthFest LA Event. The 2015 event was held in the downtown area of Culver City.

Being a supporter of green initiatives, Darren jumped right in and helped me organize the 2015 event. He attended meetings, brought together like minded people to add to the effort, provided important ideas and even got a few new speakers and vendors to exhibit at the event. His band played an excellent set of Classic Rock originals and covers that was well received by the crowd. Acoustic Generation showed up on time, ready to rock with a great attitude. They added some musical energy to the event that was much appreciated.

Because of logistical issues beyond our control, we had to move the event's location in the month before the event, but Acoustic Generation was flexible and adapted to our needs.

I highly recommend Acoustic Generation for any LA County Arts events, Summer Concert Series, etc. - both you, the event organizers and especially the crowds will love the Generation. Darren likes to say, "once you hear the Generation you are part of the Generation" and it is true.

Response P44-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P45 - Jeffrey Holmes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P45

Comment P45-1 I am writing to comment on the LA Aerial Rapid Transit proposal.

As an architect living in Southern California, and having undertaken complex, large-scale urban projects both across the country and around the world, I am thrilled by this innovative, world-class proposal for LA. The project deftly increases accessibility and connectivity between numerous LA communities while creating a new, unique LA experience that will be sought after by residents and visitors alike. And it does all of this while reducing transportation related pollution and congestion!

I fully support his project and look forward to its completion.

Response P45-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P46 - Jack Humphreville

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P46

Comment P46-1 Who is paying for this?

Response P46-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P47 - Julia Tauscher

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P47

Comment P47-1 Hello Mr. Zellmer,

Please find attached our comments on the above referenced project.

Best,

Julia Tauscher

GENERAL MANAGER/PARTNER

Philippe The Original, LLC

1001 N. Alameda Street

Los Angeles, CA 90012

E: jtauscher@philippes.com <mailto:jtauscher@philippes.com>

W: (213) 628-3781

November 17, 2022

Cory Zelmer

Deputy Executive Officer

Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, Mail Stop 99-22-6

Los Angeles, CA 90012

LAART@metro.net

RE: PUBLIC COMMENT ON DRAFT EIR FOR THE PROPOSED LAART PROJECT

Dear Mr. Zelmer,

As a LA Historic business, within the boundaries of the proposed project zone, which will be greatly impacted by the LAART project, we wish to submit our opposition to the Draft EIR presented in October 2022. Much like our neighbors, the California Endowment and Homeboy Industries, that joined in a response opposing the LAART, dated November 16, 2022 (attached), we share many of the same opinions for opposing the project.

Due to limited resources, we are currently unable to provide the same detailed response, but with our immediate proximity to both the CA Endowment and Homeboy we wish to join in support with their opposition letter.

Areas of concern:

Response P47-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P47-2 through P47-7. This comment references an attachment which is a November 16, 2020, letter from The California Endowment and Homeboy Industries regarding the Notice of Preparation ("NOP") for the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for the NOP and all comments on the NOP.

Comment P47-2 People not using public transport to arrive in LA

Response P47-2 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment P47-3 Parking- the study does not reflect accurate information

Response P47-3 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P47-4 Displacing the traffic to a new area less than 1 mile away

Response P47-4 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a

transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P47-5 Street closures and loss of business during construction

Response P47-5 Section 3.17, Transportation, of the Draft EIR includes detail regarding proposed Project construction, including anticipated lane closure and detours. As described in Section 3.17, Transportation, of the Draft EIR, the proposed Project would implement a Construction Traffic Management Plan during construction that would include street closure information, detour plans, haul routes, and a staging plan. Refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would create a Business and Community Support Program and a Business Interruption Assistance Program to assist local businesses financially affected by proposed Project construction activities.

Comment P47-6 Overall feasibility of the project

Response P47-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. The Draft EIR itself serves as a "feasibility study" for the proposed Project, with 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. The proposed Project is feasible.

Comment P47-7 There seems to be a need for further development and discussion that we would like to be a part of to come to the best possible ways to reduce the impact of vehicles to the City of Los Angeles and be an equitable partner with the community.

Best Regards,

Julia Tauscher

PHILIPPE THE ORIGINAL

Partner & General Manager jtauscher@phi1ippes.com

Attachment: Letter dated 11-16-2022

Response P47-7 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P48 - Bill Przylucki

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P48

Comment P48-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P48-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P48-2 Metro went forward with this project without an open public process and without competitive bidding. Details about the ownership or operation of the project have been hidden from the community. The financial commitments are unclear, and I am worried that public funding will be required to cover and maintenance and construction cost overruns.

Response P48-2 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at

both the in- person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P48-3 The Chinatown communities is one of the poorest areas of Los Angeles. Community members were not consulted about this project, and did not ask for it. Public employees' time and energy would be better spent consulting with residents to identify the real needs of the community, not facilitating the pet project of a wealthy developer at the expense of the entire community.

Response P48-3 Refer to Response P48-2 for a discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Metro sought to engage the community in each stage of the environmental review process. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter P49 - Faraz Aqil

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P49

Comment P49-1 Hello. My name is Faraz Aqil, and I'm a resident of Downey,who one day hopes to visit my first in-person Dodgers game by using this newtransportation system from Union Station to Dodger Stadium. The concern I have with the ART project is regarding its highcapacity (how many riders can fit into a gondola [cabin size]), and the fastaccess (how many trips can the system quickly get all riders through[especially during High Dayevents]).

According to the Draft, it states that each gondola cabinhas a capacity of 30-40 riders each (pg: 2-18). The travel time for onedirection is approximately 7 minutes (pg: 2-42). The system has anapproximatemax capacity of 5,000 riders for 1-way (10,000 riders if both ways are used atmax capacity) (pg: 4-59). And it takes about 23 seconds for a cabin toarrive/departure at a station (pg: 2-42), which means I estimate 36.52 gondola cabins will be needed to have a 14-minute round trip (for that 23 seconds average to happen).

However in practically, I doubt that the Gondola Systemcan drop off and take in passengers around 23seconds. Unless the ART groupcan show a computer demonstration (or a live video) of 5,0000 different ridersusing the system during a High Day, I'm seriously worried that the 23 secondsclaim is an over estimation. Not to mention if there's something that comes up (like a wheel chairpassenger, a baby stroller, bike rider.. etc.) the gondola system will takelonger. This is coming from experience using LA Metro's trains, where trains usuallytake around 1 minute to drop off & pick up passengers. Even in this report, itstates that, "a cabin could be stopped to accommodate passenger boarding"(pg2-18), which I suspect will happen quite often. And as a result of the Gondola pausingto accommodate passengers, the rest of the cabins in the system will be stoppedtoo by being idle (which will cause delays and less transported passengers peran hour).

I estimate that each gondola cabin will take around 1 minute on average. And if that's correct, thenthe Gondola system will only be able to transport an average of 2000 riders 1-way(4,000 riders if both ways are used at max capacity). This would be unfortunatebecause many riders will see that this transportation system is extremely slowand result in riders not relying on it to reach the Dodgers stadium (especiallyif this system gets a reputation for very long lines/wait times).

Response P49-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction. The cabins would move at an

approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds. The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 passengers per hour per direction (pphpd). To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment P49-2 My recommendation would be to instead use an aerial train/monorailsystem to transport riders to/from Union Station to the Dodgers stadium. Rail is a morereliable and a faster mode of transportation then a Gondola system. Trains canhold hundreds of passengers per a trip. And it would rely on less staff then the 20staff needed to run the Gondola system. I'm honestly surprise that of the 3alternatives mentioned in the report, no Rail option was mentioned. We should bebuilding a transportation system not just for the riders of now, but for future riders as well (especially since this report estimates that ridershipdemand will only grow larger by year 2042, up to 13,030 daily riders in a HighDay) (3.17-35).

Thank you for taking the time in reading this comment.

Response P49-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options for a discussion on the range of alternatives considered for the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of how the ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium (unlike more traditional forms of rail transit) and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. In addition, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment Letter P50 - Greg Camphire

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P50

Comment P50-1 I'm writing with concern about LA ART and Metro's recently released Draft Environmental Impact Report on the potential environmental impacts resulting from the McCourt Gondola.

Response P50-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P50-2 through P50-4. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P50-2 This report reflects the fact that there has been no considerable input from the communities who will be most affected by this gondola. It is clearly the pet project of a billionaire with too many unanswered questions about safety, cost, maintenance, and even the actual purpose of the gondola.

Response P50-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely and efficiently. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and

Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station, and a separate operator would be stationed in a control room to monitor activity throughout the proposed Project. Maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine.

Comment P50-3 The gondola is a waste of time and money—a stunning $300 million price tag—that could be better spent on any number of initiatives that would actually benefit local residents. Since nearly every Metro project has historically gone significantly over budget, the risk for taxpayers to be held financially responsible for expenses beyond the initial construction costs is enormously significant. At the same time, there is already a free shuttle available that serves the same exact function as a costly gondola ride.

Response P50-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for

discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P50-4 The recent election of Los Angeles' new mayor proves that the people do not want billionaires running or ruining our city. We must stop this wasteful, tacky, bloated, and completely unnecessary gondola from being built. It will be an expensive eyesore from an out-of-touch oligarch that scars the landscape of LA.

Stop the gondola project now!

Response P50-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Responses P50-2 through P50-3 regarding the Project Sponsor. the proposed Project's costs, and the need for the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment Letter P51 - Daniel Freedman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P51

Comment P51-1 Hi: Can you please send me a copy of the Oct 22, Scoping Meeting recording for the gondola project? I would be interested in using it for a class I am teaching. Thank you!

Response P51-1 Materials presented at the informational workshops, along with recordings of the October 22, 2022 informational workshop, are available on the proposed Project's SB 44 website. Refer to Appendix B, Public Hearing Transcripts, of this Final EIR for transcripts of the public hearings. An email responding to this request with a link to the recording of the October 22, 2022, informational workshop was sent to the commenter upon receipt of this comment.

Comment Letter P52 - Marceline Phillips

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P52

Comment P52-1 Please do not build a gondola. If you look at the London cable car over the Thames it's either slower or comparable to existing transit modes, except it has a much, much lower capacity and wait times are longer due to this low capacity.

Instead use the money to help fund a northern extension of the WSAB to Dodger's stadium.

Response P52-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, which provides examples of gondola systems in cities around the world, including the Emirates Air Line monocable detachable gondola in London, England, with a capacity of 2,500 persons per hour per direction (pphpd), which carries 10 people per cabin, over a distance of 0.68 miles for a five-minute travel time. In comparison, refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project is a tricable detachable gondola system, or 3S system, with a capacity of up to approximately 5,000 pphpd, which typically carries 30 to 40 passengers per cabin, and would travel over a distance of 1.2 miles for a seven-minute travel time. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world. Additionally, refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P53 - Martin Hoecker-Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P53

Comment P53-1 Metro,

This project seems laughable. The proposal's "...maximum capacity of approximately 5,000 people per hour per direction" is dwarfed by the needs of Dodger stadium which has a capacity of 56,000 people. It would take over 11 hours to fill the stadium at that rate and another 11 hours to empty it. Even if the system was extended to the other side of Chavez Ravine (Echo Park or Silver Lake or Elysian Valley) so that there are two boarding points to double the capacity the system would be overwhelmed by the needs of the stadium. This project uses a mode of transportation that can not cope with the needs of the stadium. Although I applaud the motivation this project should be sent back to the drawing board. It suffers from a fundamental misunderstanding of the transportation needs. Build a system based on a higher capacity mode of transit (e.g. rail, or Bus Rapid Transit with dedicated right of way) that can handle the departing crowds of more than 30,000 people per hour.

Response P53-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system, which is equal to roughly 1,000,000 passengers per year at Dodger Stadium. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit

systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P54 – Baldomero Capiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P54

Comment P54-1 I am Baldomero Capiz and, in my opinion, the project will be financially beneficial to millionaires. It will not bring any benefit to poor migrant communities.

Response P54-1 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within the surrounding communities while unifying and connecting communities through transit mobility access. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P54-2 It will result in more mental, emotional, psychological ailments and death.

The community must organize to defend the future of our families.

Response P54-2 Refer to Response P54-1 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response J, Gondola Design and Operations, for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment Letter P55 – Ruby Andalon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P55

Comment P55-1 Will the Gondola going to effect the people living down below. (The privacy and safety).

Response P55-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties.

Comment Letter P56 – Rebecca Ocaqueda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P56

Comment P56-1 I don't agree with this project.

1. It won't help the environment.

Response P56-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P56-2 2. It will take space away from the park.

Response P56-2 As discussed in Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic

Park, the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

Comment P56-3 3. It will only be good to fill up the pockets of those who are the most interested in the project.

Response P56-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to the Response P56-1 for a discussion of the proposed Project's potential environmental benefits. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P56-4 Finally, it won't eliminate the traffic from our roads.

Response P56-4 Refer to Response P56-1 for a discussion of the proposed Project's ability to reduce vehicular travel and therefore vehicular congestion.

Comment Letter P57 –Maria Yglesias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P57

Comment P57-1 We are fighting hard for clear air and green spaces for our childrens and elderly population. This project is going to be a disaster for the Chinatown community where I live.

Response P57-1 As described in Section 2.0, Project Description, of the Draft EIR, the proposed Project, which would include passenger stations at Los Angeles Union Station (LAUS), the southern entrance of Los Angeles State Historic Park, and Dodger Stadium, would provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon. In addition, the proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities, including Chinatown. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. In addition, refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting

communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P57-2 Our Historical Park will be compromised and our streets will be full of traffic and pedestrians wondering around. Please stop the Gondola, we don't need it at all. Mr. McCourt can make money somewhere else. Stop the Gondola!

Response P57-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and

donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P58 – Arturo Gonzalez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P58

Comment P58-1 My name is Arturo Gonzalez with neighborhoods coalition. I honestly believe that Metro has reneged on their commitment to the community it serves.

Serving the interest of a multi-millionaire goes against the very core of Metro and its oath to serve the interest of all communities.

Response P58-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P59 – Kevin Jauregui

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P59

Comment P59-1 As a Native Angelino, with roots and history in this town, we already see that many mistakes have been made by our past. The amount of pollution in our city has caused massive disease to our people. Lack of green space negatively impacts our mental health.

Response P59-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park.

Comment P59-2 This gondola seems to be "killing two birds with one stone" in the sense it'll be making air quality worse in already under served communities AND taking away green space by building on the park. Please, for the sake of our communities and our future DO NOT BUILD THE GONDOLA

Response P59-2 Refer to Response 59-1 for discussion of the proposed Project's ability to reduce vehicular travel, improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park

amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment Letter P60 – Julie Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P60

Comment P60-1 I have lived in Chinatown at the Senior Metro Lofts for 10 years #. I walk in Chinatown, I use public transportation in Chinatown, I support the community of Chinatown.

Response P60-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P60-2 The Gondola project will create havoc in a senior centric neighborhood. The transmission of disease is possible due to the increased traffic, the pollution impact of the cars that will take our parking spaces.

Response P60-2 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P60-3 The lookieloos, the tourists and the enthusiastic Dodger fans will mow us/seniors and Chinatown residents over. The now idyllic park will be irrevocably destroyed by the traffic and the gondola

Response P60-3 Refer to Response P60-2 for discussion of how the proposed Project would have less than significant operational impacts, including for transportation and at the Park, and how comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments and demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment Letter P61 – Patrick Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P61

Comment P61-1 As a resident of Chinatown, I am writing to express my concerns and objection to the LA ART gondola project. This Draft environmental impact report does not address serious issues with how the gondola's construction and operation would negatively affect the working class and aging population of Chinatown. One of the worst problems unaddressed is how this will cause more traffic and traffic safety issues in Chinatown as one of the gondola stations is in Chinatown.

Response P61-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill

743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.17, Transportation, of the Draft EIR, for a discussion of how the proposed Project, including the Chinatown/State Park Station, would not substantially increase transportation hazards to vehicle, pedestrian, or bicycle safety due to geometric design feature or incompatible use with the implementation of mitigation.

Comment Letter P62 - Davanna Molinari

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P62

Comment P62-1 There is a moral issue at stake again, where the community of Chinatown is again getting the short end of the stick. There are many inequalities faced by the community but today non is as damaging as the LA ART project that is now at a stage where is waiting for approval without the process ever considering the local community and impacts to its residents and many stakeholders like myself.

Response P62-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Comment P62-2 This lack of a community benefit project and dream of a single individual is quite selfish. Have you all ever been in Chinatown during a Dodger game, a gondola will not solve the issue, the gondola in fact is not local community friendly.

Response P62-2 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses and other community benefits for Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P62-3 Lastly as a long time resident of northeast Los Angeles and current resident of Lincoln Height, and one of the youth pictured with the Governor Gray Davis when he announced the purchase of what is today LA State Historic Park I am appalled by the possibility that this community resource will be impacted. How can public agencies that will take part of saying yes or no to this project in the approval process, ever consider saying yes. An approval of this project would go against the benefits that they are task with upholding to local constituents. Additional can we please independent traffic and other studies that are being used to approve this project? It is unfair that the more resource get to draft their own document.

Response P62-3 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[3] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the

[3] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment Letter P63 – Bill Chin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P63

Comment P63-1 The Dodgers is not a good neighbor for my community of Victor Heights & Fig. Terrace. 80+ days of home games is a bad impact on my life. Traffic is slower on the freeways, Sunset, College Street (Westbound). Fireworks brings other into community to see bombs blow-up in the sky. I see walker coming thor my streets, Beaudry Ave, College Street, Alpine Street, Bartlett Street, Figueroa Street, Sunset Blvd. Many streets are needed for locals to park after working long hours in the evening. They walk thur speaking loudly at night. This is damaging to my community. I feel lose after living here 54 years!

Response P63-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P64 – Frank Hom

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P64

Comment P64-1 The gondola project is an environmentally unsafe solution for traffic to Dodger Stadium on many counts.

Response P64-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P64-2 1 – affects entire community of Chinatown residents and businesses

Response P64-2 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P64-3 2 – affects businesses in original Mexican town.

Response P64-3 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P64-4 3 – affects usage of California State Park

Response P64-4 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary

system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P64-5 4 – construction will upset environment and health of elderly in Chinatown

Response P64-5 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As summarized in the Executive Summary of the Draft EIR, the proposed Project would have less than significant impacts related to construction with the exception of Noise and Vibration (human annoyance). Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support Program during construction. As summarized in the Executive Summary of the Draft EIR, impacts related to operations of the proposed Project would be less than significant. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Noise standards, which are generally stated based on the use function of the property and not by age group, are nonetheless developed to protect sensitive populations, including seniors and children. Refer to Section 2.8, Construction, in Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project.

Comment P64-6 5 – 100% profit motive for 1 man Frank McCourt

Response P64-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P64-7 6 – GREED

Response P64-7 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P65 – Raul Macia Franasco Serran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P65

Comment P65-1 The failing project does not have a reason to exist because the city does not need it, it is illogical. The community needs other alternatives that do benefit us and lead us to progress, not backwards. No gondolas.

Response P65-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P65-2 Alternatives need to be sought to improve access to the stadium without affecting the neighbors in the area. We have too much pollution in every sense, it is harming not only the area but also a big part of Los Angeles.

Response P65-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management

Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P65-3 I do not agree with the Gondola Project because it would slow down movement in the community regardless.

Response P65-3 Refer to Response P65-1 for an overview of the need for the proposed Project. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment Letter P66 - Herminia G. Andrade

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P66

Comment P66-1 The noise and the environmental impact, along with pollution, would result in psychological and physical harm.

Response P66-1 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Response G017-129 for a discussion of health impacts from construction and operational noise of the proposed Project. As discussed therein, noise from construction and operations of the proposed Project would not result in health impacts. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P66-2 This Gondola Project should not be approved, the noise will especially affect us, seniors.

Response P66-2 Refer to Response P66-1 for discussion of how operational noise impacts of the proposed Project would be less than significant Refer to Response GO17-129 and Response GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. Noise standards, which are generally stated based on the use function of the property and not by age group, are nonetheless developed to protect sensitive populations, including seniors and children.

Comment Letter P67 – Alan K. Weeks

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P67

Comment P67-1 I would like to submit a comment concerning a point in your draft environmental report in the section concerning the State Park there is little or no information as to what changes the Tramway will make. I would like to see more detailed information.

Response P67-1 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response to S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment Letter P68 – Antonio Rodriguez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P68

Comment P68-1 The easiest way to solve the issue of traffic and pollution is to extend the Chavez metro underground without affecting communities.

Response P68-1 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between Los Angeles Union Station (LAUS) and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P68-2 The metro service is being extended but no parking spaces are created in each metro station.

Response P68-2 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P68-3 The City of Los Angeles is making money with parking fines by metro stations.

Response P68-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P69 – Samuel Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P69

Comment P69-1 My name is Samuel Perez with AMP Los Ang4eles and would like to submit these following statement about the LA ART gondola. This gondola is buit on public land using public funding then we would use public funds to help generate revenue for a private company. This would not help anything to do with the public and/or emissions.

Response P69-1 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P69-2 Also the gondola system is outdated and surpassed by modern tech. To conclude my statement, I [inaudible] disagree and am against the building of this Gondola.

Response P69-2 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation

infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment Letter P70 – Ci Zhang Maory

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P70

Comment P70-1 A. The gondola has much more harm than benefit;

B. Nowadays, technology changes fast. Various advanced transportation tools will emerge in the future. A gondola is an old and outdated way of transit;

Response P70-1 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P70-2 C. The gondola has many disadvantages, most people object to building it!

Response P70-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or

raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P70-1 for a discussion of the benefits of the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P71 – Ramon Cruz Moya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P71

Comment P71-1 My name is Ramon Cruz Moya. I am a son of an agricultural laborer and was born back in 1942. Frankly, I do not agree with carrying out this gondola – and metro – project because of the communities that will suffer a lot without their homes, where the metro might be built. Seniors can't take the terrible sadness of losing their homes.

Response P71-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P71-2 Many boys and girls will suffer because of their schools.

Response P71-2 Refer to Section 3.15, Public Services, for a discussion of schools. During proposed Project construction, impacts to schools would be less than significant with mitigation. Impacts on schools during proposed Project operation would be less than significant.

Comment Letter P72 – Joseph Amard

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P72

Comment P72-1 I am concerned that the Gondola will impact (1) the air quality in the area;

Response P72-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P72-2 (2) will bring more traffic to the streets;

Response P72-2 Refer to Response P72-1 for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P72-3 (3) will change the Historic Park environment and create visual blight

Response P72-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section

3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. The Final EIR has added additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment P72-4 (4) increase in noise to the area;

Response P72-4 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant.

Comment P72-5 (5) why change to a gondola – when we have an alternative with the Dodger's Express Bus!

Response P72-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a

range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

December 2023

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VOLUME III

Prepared for:

Los Angeles County Metropolitan Transportation Authority

Metro

Prepared by:

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Comment Letter P73 – Daniel Andalon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P73

Comment P73-1 As a member of the eastside community we fought long and hard, many years ago, to ensure our city and communities had greenspace for future generations.

Response P73-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P73-2 The EIR p 3.11-42 says the project would be inconsistent with the State Historic Park General Plan and would have to amend it. I am not in any way supportive of a project that would disrupt this plan!

Consider alternatives like the "shuttle bus connectors" which the EIR admits is superior alternative.

Response P73-2 Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the

proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P74 – Chace Espinosa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P74

Comment P74-1 Although I may not exist in LA to witness this potential establishment, I highly benefit this project, as it could grant a better view of the entire city and its aspect of transportation, and hopefully others that seem to criticize it can see it as a wide benefit in the mere future.

Response P74-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P75 – Franco Stefano Blancaflor

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P75

Comment P75-1 I SUPPORT this project!!??

Response P75-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P76 – Jacob Lopez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P76

Comment P76-1 As a Cathedral Student, I fully support the Gondola Project.

Response P76-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P77 – DJ Gonzalez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P77

Comment P77-1 i like the gondola and im a cathedral student

Response P77-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P78 – Xavier Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P78

Comment P78-1 I like it from cathedral student!

Response P78-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P79 – Cayla McCrae

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P79

Comment P79-1 Hello,

As a resident of LA's Chinatown neighborhood, I OPPOSE the LA ART Gondola to Dodger Stadium for the following reasons:

THE McCOURT GONDOLA WOULD ALTER THE CHARACTER AND USE OF LOS ANGELES STATE HISTORIC PARK. The Gondola would undo years of community advocacy for a tranquil green space. The view from the park to the LA Skyline will be littered with cables and gondola cabins, and chase away wildlife, especially birds.

Response P79-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response to S2-4 for additional discussion regarding the ability of uses to continue at the Park. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, Los Angeles Union Station (LAUS), El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing

urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Additionally, refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project are likely to reduce the risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines.

Comment P79-2 THE McCOURT GONDOLA WOULD USE PUBLIC RESOURCES FOR PRIVATE PROFIT. This project requires the use of public rights of way, public air rights, and public lands and serves only to benefit Frank McCourt.

Response P79-2 Refer to Topical Response L for a discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.5, Proposed Project Alignment and

Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P79-3 THE McCOURT GONDOLA WOULD HARM OUR NEIGHBORHOODS. The enormous gondola cabins would travel over the rooftops of family housing. Neighborhoods located near the gondola stations would experience increased traffic and parking problems, endangering pedestrians, especially seniors and children.

Response P79-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for a discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Section 3.03 , Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project

Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 3.17, Transportation, of the Draft EIR, for a discussion of how hazard and visibility impacts to pedestrians would be less than significant with mitigation. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include pedestrian network improvements (such as hardscape and drought tolerant landscaping improvements), open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to the Los Angeles State Historic Park and Elysian Park.

Comment P79-4 THE GONDOLA (LARTT LLC) AND METRO ARE, SEEKING APPROVALS WITHOUT MEANINGFUL COMMUNITY ENGAGEMENT OR TRANSPARENCY. A project that would permanently alter our neighborhoods and the Los Angeles State Historic Park requires a full public review. Basic information has been withheld including the location of the towers, and the height and scale of the stations. The two potential routes were chosen without public input.

Response P79-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the

initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities. As discussed in Topical Response C, Project Features, the design for the proposed Project's stations and junction studied in the Draft EIR would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, implementation of the proposed Project's Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, and both the Alameda Tower and Alpine Tower will provide additional hardscape and landscape updates around the tower bases. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of Mitigation Measure LUP-A, which would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park and Recreation Commission, which retains its independent authority related to the proposed Project. The General Plan Amendment process would include additional public processes before the Commission. Refer to Section 2.0, Project Description, for a description of the location and design, including dimensions, of the proposed Project's stations, towers, junction, and cabins.

Comment P79-5 TAXPAYERS WILL LIKELY END UP PAYING FOR THIS PROJECT. How will McCourt pay for it? What will it cost to operate and maintain the system? What happens with cost overruns? Who pays for it?

Response P79-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L for a discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated

to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P79-6 THIS IS A TOURIST ATTRACTION, NOT REAL TRANSIT. At up to $30 per ticket for a 1.5-mile ride, this project is not transit that community members would use to access essential services.

Response P79-6 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment P79-7 REAL PUBLIC TRANSIT TO DODGER STADIUM EXISTS AND IS OPERATING. The Dodger Stadium Express which has committed to zero emissions is a wildly popular bus program utilized by many happy Dodger fans.

Response P79-7 Refer to Response P79-6 for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Further, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P79-8 STOP THE CORPORATE WELFARE for billionaires and the privatization of our public spaces.

Help us protect our neighborhoods and the Los Angeles State Historic Park.

Sincerely,

Cayla McCrae

Response P79-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This

comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P79-1 through P79-7.

Comment Letter P80 – Thomas Lemos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P80

Comment P80-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This project does nothing for the surrounding neighborhoods and literally makes them irrelevant by placing this eye sore for all to see every day. This is something that would only be utilized part of the year. There are already buses to Dodger Stadium and if more access is needed, maybe they should work on improving access without impacting a neighborhood with a huge eyesore that would be a waste of money. Take the money to be spent on this project and work on making the current system better. Don't build something that won't be used by anyone except on game days.

Response P80-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon,

and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P81 – Marissa Roy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P81

Comment P81-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

There are many public transportation projects that need to be funded, and this gondola project is duplicative (there is already a bus) rather than expanding access where it currently is absent or underfunded. In general, there needs to be more of a transparent process with community input and feedback to determine priorities.

Response P81-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to

meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities.

Comment Letter P82 – Tabatha Yelos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P82

Comment P82-1 Deputy Executive Office Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium)

This project will be dangerous for the community. I do a lot of work in the area as an organizer, and I can tell you that people are not truly informed about the impacts of this project. Chinatown has the second lowest AMI in the City after Skid Row. This is a community that needs investment in housing, grocery stores, and healthcare facilities!!

Response P82-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P82-2 A construction project in the neighborhood will have negative impacts, especially in air quality for a community of majority-elderly residents. That's crazy!

Response P82-2 Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR for discussion of the impacts to air quality from construction of the proposed Project, which would be less than significant. As shown in Table 3.3-4 and Table 3.3-5 on page 3.3-22 and page 3.3-23 of the Draft EIR, respectively, the proposed Project would not exceed daily mass emissions thresholds during construction. Table 3.3-6 and 3.3-7 on page 3.3-24 and page 3.3-26 of the Draft EIR, respectively, show that construction activities would also not exceed thresholds for localized emissions of criteria pollutants or health risk thresholds. As discussed in Section 3.03, the proposed Project's Health Risk Assessment evaluated the estimated cancer risk and non-cancer chronic hazard index associated with construction of the proposed Project. The HRA was conducted in accordance with SCAQMD risk assessment guidelines, which include a number of conservative assumptions to be protective of human health and to estimate potentially higher risks and sensitivity factors for infants, children, and other sensitive receptors. The HRA also assessed risks for off-site sensitive receptors including residents, daycare children, school children, and senior centers. Table 3.3-7, Maximum Individual Cancer Risk and Hazard Index due to Construction of the Project, of the Draft EIR, provides the results from the construction HRA, showing that the maximum incremental cancer risk and chronic non-cancer impacts would be below SCAQMD significance thresholds for all modeled receptors, which include the sensitive receptors (e.g., senior centers) located near proposed construction areas.

Comment P82-3 The meetings have also not been conducted in Cantonese, which is the main language spoken in the neighborhood. Vietnamese is also spoken a lot in the area.

Response P82-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Proposed Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P82-4 We all know that McCourt plans on developing the Dodgers parking lot so, will this really reduce traffic? Or just displace it to another neighborhood? Chinatown cannot become a parking lot!!

Response P82-4 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project

Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the TAG. Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to affect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P82-5 This will be devastating to the community. Do better! We need AFFORDABLE HOUSING, GROCERY STORES, AND HEALTHCARE FACILITIES for an aging community. Not this ridiculous project that will destroy the community and poison elderly residents!

PLEASE DON'T BUILD THIS!

Tabatha

Tabatha Yelos
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Los Angeles, California 90028

Response P82-5 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P82-1 through P82-4.

Comment Letter P83 – Logan Rapp

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P83

Comment P83-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

We have known how harmful Frank McCourt has been to this city for quite some time. Why are we allowing Metro to be the vehicle to move this gondola forward, and then turning around and calling this a "private" matter?

Frank McCourt's nonsense should not be allowed to be subsidized by this city. Even to just talk about the details of the project, you have to sign an NDA! This is unacceptable and a complete lack of transparency. END THIS PROJECT NOW.

Response P83-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P84 – Amy Gatto

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P84

Comment P84-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This project will drive private profits, but will take public funding away from other important projects, like installing crosswalks and traffic lights.

Response P84-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P84-2 The poles will sit on public land and the gondola will take public airspace. Thank you for your consideration.

Response P84-2 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties.

Comment Letter P85 – Akio Katano

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P85

Comment P85-1 Deputy Executive Officer Cory Zelmer,

I am writing to STRONGLY OPPOSE the Gondola to Dodger Stadium. We need actual transit infrastructure, not a vanity project for a sports team. This project would shift the burden of traffic and parking to the vulnerable community of Chinatown, and also lead to gentrification and displacement in that neighborhood.

Response P85-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P85-2 To go forward with a project like this without a public proposal process or competitive bidding is an insult to the city. At a time that we're already struggling with corruption

in city hall, to conceal details from the people shows that this is going to be a naked cash grab by developers.

Response P85-2 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P86 – Timothy Hayes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P86

Comment P86-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Metro has a history of making important decisions behind a veil of privacy. This lack of transparency is again on display with this absurd proposal. From financing to ownership and operation nothing has been made clear to the public. What makes this is even more infuriating is that the public will probably be left holding the bag by a series of decisions they never got to interrogate or vote on. The gondola is a weird vanity project that neither the city nor the neighborhood needs.

Response P86-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and

Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P87 – Anthony Weiss

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P87

Comment P87-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I am deeply concerned at the lack of transparency around what is being touted as a transit project but appears, functionally, to be a vehicle designed to serve and enhance the value of private lands owned by the McCourt family. It is unclear why any public funds whatsoever should be devoted to this project when they could be devoted to a long list of projects with genuine public benefits that would benefit me and many other Angelinos: fare-free transit; increased bus service; more frequent rail service; increased cleaning and repairs for all transit vehicles; and much more. This will have a direct impact upon me and my family as transit users whose transit system may well be weakened and impoverished by this project.

Response P87-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P87-2 Perhaps even more troubling to me is the apparent constant demands from the chief organizers of this private gondola project to demand that everyone who interacts with them — including government agencies — sign Non-Disclosure Agreements,

likely a violation of law, and undeniably a slap in the face to any sense of public trust. How are we know even basic information about this project? How much it will cost? How much of that cost will be borne by the public? Who will be responsible for cost overruns? Where will the support pillars go? Which communities will they disrupt, which people displace? As a resident of Los Angeles and a taxpayer, I am deeply concerned about how this will affect the finances and economy of my city, as well as my fellow residents.

Response P87-2 Refer to Section 2.0, Project Description, of the Draft EIR, for information about the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Metro has complied with and will comply with all applicable laws. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period.

Comment P87-3 Metro is moving forward with this project despite the lack of public interest or desire, beyond the McCourt family real estate empire, without competitive bidding, without community consultation or input.

This project has been embarked upon without proper due diligence. It is not a project that anybody, save the McCourts and their friends, wants. It should be stopped in its tracks and buried, never to be revived.

Response P87-3 Refer to Response P87-1 for an overview of the need for the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process.

Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding and during the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. The Draft EIR itself serves as part of the "due diligence" for the proposed Project, with 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Refer to Response P87-1 for discussion of the Project Sponsor.

Comment Letter P88 – Betty Doumas-Toto

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P88

Comment P88-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P88-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P88-2 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? There has been 0 transparency.

Response P88-2 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P88-3 The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

We never asked for this project, this project is not need and has adds no benefit to the community.

Response P88-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, privacy features, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P89 – Eli Jacobovitz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P89

Comment P89-1 Deputy Executive Officer Cory Zelmer,

I am in absolute opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This is a project that would destroy a community of people of color in the Chinatown area of Los Angeles. This is a project that is geared towards tourists and no one in the community asked for or wants this project.

Response P89-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P89-2 for a discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P89-2 It is not needed and will do harm to poor communities and will displace the surrounding community that lives where this project would be constructed. This is another Chavez Ravine and if put forth will live in the same infamy of displacement, increasing number of homelessness, and mistreatment of people of color. Chinatown is a beautiful part of our city that should be respected and preserved, not bastardized with a facade of a metro project that will also eat into their budget when we need metro improvements that Angelinos HAVE asked for.

Response P89-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, including Chinatown, how the public outreach for the proposed Project was designed

with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P90 – Jennifer Lei

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P90

Comment P90-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I don't believe that it will provide any additional benefits to the community. There is already a problem with housing and buying out properties to install the gondola would not be a good use of our resources. Additionally, there is already a free shuttle that is in use with a designated bus lane that goes through Sunset. As a resident that lives near Dodger Stadium, I understand that traffic congestion can get crowded but a research study done by UCLA acknowledges that the gondola would only limit traffic by 1%. The benefits do not weigh out the consequences. Please stop the construction of the gondola.

Response P90-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. The Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment (Assessment) found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft, and recommended the proposed Project work with Metro to identify a transit partnership to further encourage proposed Project riders to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Comment Letter P91 – Melody McBride

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P91

Comment P91-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P91-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P92 – Gizelle V zquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P92

Comment P92-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a lifelong resident of the city of Los Angeles, I have seen many instances of the displacement of residents. This project would be another instance of this and increase the cost of living in this area. I also do not believe the gondola is necessary for the city, as free transportation already exists to Dodger Stadium. The funds would be better used elsewhere to help the people of Los Angeles.

Response P92-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned

sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P93 – Dylan Kirk

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P93

Comment P93-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). It will negatively affect so many communities, and there is so little research that justifies the funding and execution of this project.

Response P93-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P93-2 There has been a complete lack of transparency, and as a lifelong LA resident and Dodgers fan, I find this project to be a waste of taxpayer dollars. There has been little to no community input, and we?re heading into a recession; LA residents, especially those in affected communities, don?t want to spend money on a useless gondola. Put the money into improving the public transportation system in LA, and improving the lives of residents who rely on public transportation to support the local economy instead of trying to increase profit. It?s a scummy plan, and everyone so know vehemently opposes it. So who actually wants this? Because it doesn?t seem like local residents do.

Response P93-2 Refer to Response P93-1 for an overview of the need for the proposed Project and for discussion of the proposed Project's costs and planned sources of funding. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter P94 – Cole Barrios

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P94

Comment P94-1 Deputy Executive Officer Cory Zelmer,

I am a student in this community writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Nobody ever asked for this project. We don?t need or want this project. Please don?t waste taxpayer money on it. That money could be used on an actually effective method for solving our transit issues. Research has already been conducted at universities that demonstrate its lack of practical effects. This project will only pollute the communities it is built by more than they already are.

Response P94-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Topical Response O, Response to UCLA Mobility Lab Study,

for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter P95 – Ashley Harmon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P95

Comment P95-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P95-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P96 – Anne Freiermuth

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P96

Comment P96-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

This is ultimately a money making project for the Dodgers and I am alarmed by the prospect that public money would be pulled from Metro's limited budget to fund it. As a resident of Los Angeles, I do not want my tax dollars used for private gain.

Response P96-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P96-2 The Dodgers already regularly violate the agreement they have with local residents about how many events happen each year and when. Now they want a city-funded project to enable them to do even more.

Response P96-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P96-1 regarding the Project Sponsor and funding for the proposed Project.

Comment P96-3 This project was effectively fought by the local community in the past. Now it's just moved to another venue with new branding. It needs to be stopped now.

Response P96-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P97 – Peter Kwong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P97

Comment P97-1 Hello LAART:

I have attached a letter of support for the Los Angeles Gondola project. Please let me know if there are any questions or concerns you might have. Best Regards,Peter KwongBest Western PlusDragon Gate Inn Royal Pagoda Motel

Response P97-1 This comment provides a general introduction regarding the comments raised in this letter and indicates support for the proposed Project. Responses to the comments contained in this letter are provided below in Reponses P97-2 through P97-4.

Comment P97-2 Dear Ms. Wiggins and Honorable Metro Board Chair, Supervisor Solis:

I am writing to ask for your support for the Los Angeles Aerial Rapid Transit Project. LA ART.

I was raised and lived in Chinatown since 1963 in my local family business which continues to serve and support the Chinatown community.

Unfortunately, I can't say that for many of my neighbors. Many "mom and pop" businesses that were just getting by before the pandemic have now closed. We are slowly losing the fabric of Chinatown that once was the center of local Chinese American Culture. Our amazing restaurants, fabulous gift shops and Chinese Herb store, that always had a Chinese Doctor practicing acupuncture and herbal medicine, are now slowly going away.

Like many other areas of Los Angeles, Chinatown has had gentrification forced upon it. Families that once had a thriving business now face the reality that their business will never recover. These families are sitting on properties where the land value is worth more than the buildings. Having no choice but to sell, new projects are coming online from developers with no connection to the Chinatown community.

Many outside developers all know that Chinatown is the last bastion of affordable land that they can piece together to develop high end residential over commercial retail. I don't think this will ever stop, it's an unfortunate evolution of older neighborhoods having to change to survive. However, it need not be an inevitable one.

Response P97-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C. Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed

Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response N, Environmental Justice for a discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. Specifically, the Draft EIR addressed topics related to environmental justice, including the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution.

Comment P97-3 I believe that the Gondola project will inject economic stimulus for the remaining businesses. Hopefully others will see those businesses thrive and incentivize previous business owners, as well as other local and community interests, to re-invest in Chinatown.

Response P97-3 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P97-4 This project has reached out to local people such as myself, to find out what we would like to see from them. There are many companies that never reach out to Chinatown and only reach out to us as an after thought.

I just finished a meeting with the Los Angeles Street Car project. They presented a plan to have the street cars run between 11st street to 1st street. On Hill and Broadway. I asked them why they didn't run the street cars to Little Tokyo, Olvera Street and Chinatown. If the plan was to encourage people to shop, eat and not drive cars. Then why weren't any of these three districts included? Why, because everyone forgets about us.

It is up to people like myself that have a passion for saving our communities to speak out, so that we can teach others about the history, beauty and contributions of Los Angeles Chinatown's culture and community. Hopefully this will have a positive affect in fighting discrimination and promote the survival, understanding and peaceful co-habitation of all the diverse cultures in the great city of Los Angeles.

Thank you for taking the time to read my letter. Please feel free to contact me if I can be of further assistance regarding this project or future developments in Chinatown or surrounding areas.

Best Regards,

Peter Kwong

Best Western Plus Dragon Gate Inn

Response P97-4 This comment provides a general conclusion regarding the comments raised in this letter and indicates support for the proposed Project. Responses to the comments contained in this letter are provided above in Reponses P97-2 through P97-3.

Comment Letter P98 – Ben Kolstad

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P98

Comment P98-1 This must be the worst idea I've heard in years. Please just use more buses. This pie-in-the-sky project reeks of special interest money. It is not a realistic solution to the problem of traffic during Dodger home games. Thanks very much.

Ben Kolstad
Dodger fan since '77:

Response P98-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities and how Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P99 – Ray Melendez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P99

Comment P99-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P99-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P99-2 And don't add any of those redflex red light cameras scams. Not sure who took payola for the ones in canoga park down canoga ave. What a shame. Someone got bribed.

Response P99-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P100 – Micah Enloe

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P100

Comment P100-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P100-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P101 – Steve Mirkin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P101

Comment P101-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P101-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P102 – Edgar Mendez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P102

Comment P102-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P102-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P103 – Gabriella Nieves

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P103

Comment P103-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P103-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P104 – Wendy Whitcup

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P104

Comment P104-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P104-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P105 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P105

Comment P105-1 Are both of the in-person DEIR public hearings for the LA ART Gondola (Aerial Rapid Transit project) being held in the "open house" format with various posters and kiosks stationed throughout the room? If so, how will people be able to make verbal public comment at these in-person meetings?

I'm asking specifically about the meetings on December 10, 2022 and January 12, 2023.

https://www.metro.net/calendar/laart-public-hearing-in-person/
<https://www.metro.net/calendar/laart-public-hearing-in-person/>
https://www.metro.net/calendar/laart-public-hearing-in-person-2/
<https://www.metro.net/calendar/laart-public-hearing-in-person-2/>

Response P105-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding, during, and immediately following, the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish,

and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment Letter P106 – Jack Tovar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P106

Comment P106-1 Dear Mr. Cory Zelmer, I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P106-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P107 – Nancy Hoven

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P107

Comment P107-1 I would like to make comment on the proposed gondola project between Union Station and Dodger Station. This is not a viable project to serve the greater community of Los Angeles residents.

Specifically:

Response P107-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P107-2 1. It is a for-profit company requesting the project, to be subsidized with taxpayer dollars and will benefit a relatively small percentage of the population. It will cost users considerable money to use the service, unless they hold Dodger tickets. This does not make the service accessible to those on limited incomes, rather only those who can afford Dodger tickets or the fare.

Response P107-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system,

approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P107-3 2. It serves a very limited community of people, specifically Dodger baseball fans and some communities along the route. They have other options such as the free Dodger buses during baseball season, and other Metro buses and trains.

Response P107-3 In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P107-4 3. Metro dollars would better serve ALL the communities within Los Angeles by making improvements in current Metro bus and train lines. Adding more frequent service, doing a better job at providing safe stations and vehicles, expanding the Metro Micro project, and improving overall cleanliness.

Response P107-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P107-2 for detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment P107-5 4. This would not necessarily reduce traffic and emissions. If it becomes a tourist or local novelty attraction, people will drive to the stations on the gondola route, impacting congestion and parking in surrounding neighborhoods, and not really reduce emissions overall. The sorry state of cleanliness and safety on bus and train lines discourages many people who might consider using current public transit to connect to a gondola station. The gondola will not attract more regular transit riders. We should invest in making our current transit work for those who have no options and must take public transit to their jobs, schools, medical appointments, and more.

Response P107-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N,

Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Response P107-3 for discussion of how the proposed Project would also provide daily service for the surrounding communities, would be free to ride for anyone with a ticket to a Dodgers game, and the Community Access Plan. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P107-6 5. It would be unsightly, looming over the State Historic Park, and the light, noise and mechanisms would impact wildlife, especially bird life. These elements would also impact the experience of park users and residents of adjacent communities.

Response P107-6 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Specifically, as discussed therein, impacts from light and glare would be less than significant, including at the Park. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with

implementation of mitigation. Operational noise impacts would be less than significant. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project (e.g., the lack of shield wires, the inclusion of slack carriers, presence of moving gondola cabins, and vinyl window film) are likely to reduce the risk of avian collisions in comparison to transmission lines.

Comment P107-7 Again, please don't invest taxpayer dollars into a project with limited benefit to the overall Los Angeles community.

Thank you for your consideration.
Nancy Hoven

Response P107-7 Refer to Response P107-2 for detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment Letter P108 - Miguel Nisthal

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P108

Comment P108-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P108-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P109 - Mike Connors

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P109

Comment P109-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P109-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P110 – Karin Costello

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P110

Comment P110-1 I strongly oppose Frank McCourt's vanity project.

Response P110-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P110-2 It will not seriously reduce traffic, it's expensive, and it will disrupt a neighborhood that is already greatly challenged.

Response P110-2 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emission. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment P110-3 McCourt has never done anything good for Los Angeles, and he won't start now.

I'm a lifetime Dodgers fan and native Angeleno.

Response P110-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P110-1 for discussion of the Project Sponsor.

Comment Letter P111 – Ben Park

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P111

Comment P111-1 Please do not approve the LA ART Gondola.

This project would bring negative consequences to the neighborhoods it would be built in, from noise pollution, disruptive land use and displacement of residents and businesses, to the gentrification of the communities. Furthermore, all that disruption is unnecessary:

Response P111-1 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P111-2 A far better solution to improve public transit to Dodger Stadium would be to increase the scale and reach of the Dodger Express bus shuttle routes. This solution can be made sustainable with an all-electric bus fleet, an investment that would cost far less, and be a much easier and more effective solution, in every way, than the LA ART Gondola.

Thanks for your time.

Response P111-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park, and how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and

Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P112 - Desmond Bliek

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P112

Comment P112-1 Hi Cory,

Hope you're doing well. Quick two cents on the Dodger gondola from somebody who's business it absolutely isn't:

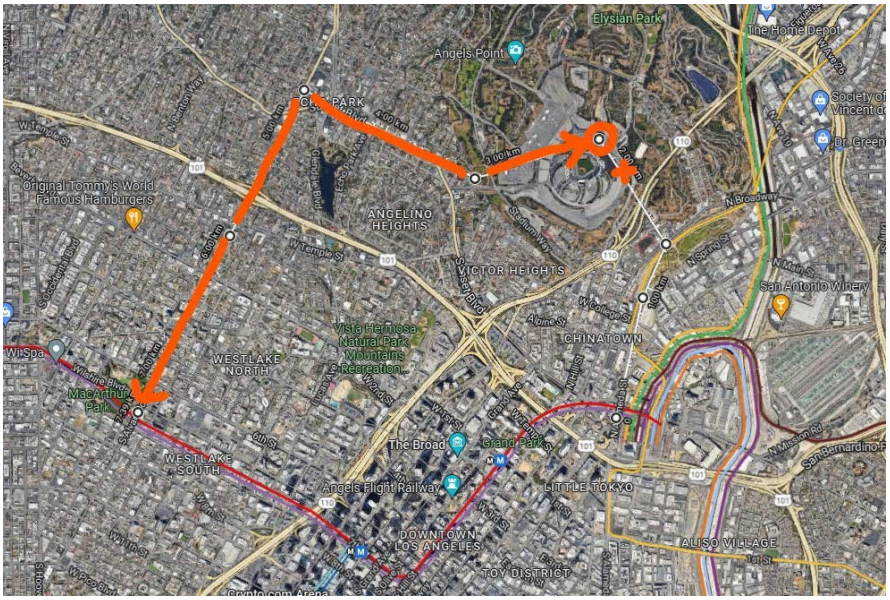
Cool project, but 100 event days out of 365 calendar days seems like a low ratio. Would be a shame to have such a great piece of infrastructure with such frequent service to a site that certainly has some high peaks, but also has a lot of valleys. With that in mind is it possible to adjust the project to attain higher and more consistent ridership?

Response P112-1 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P112-2 1- Is there a way to implement a condition that the Dodgers redevelop at least some of the parking with a mix of housing (potentially affordable) and other uses? This would potentially reduce the peak event parking and traffic load (addressing some of the air quality and congestion concerns) and provide a more consistent source of ridership on the 265 non-event days each year.

Response P112-2 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project solely proposes an aerial gondola system. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment P112-3 2- Is there a way to extend the alignment westward to serve Echo Lake? Possibly this involves second or third phases, but critically, locating and designing the stadium gondola terminal in a way that allows for future extension seems like it would be prudent, as one never knows, and it could allow for better service to Echo Lake (which is a bit off the transit track otherwise) and a potential link to the red and purple lines at MacArthur park, making access to Dodger Stadium more convenient from that direction. Pictured below (X is deleted stadium terminal, O is new stadium terminal location; think the lines mostly stick to public right-of-way):



Hope you're enjoying the project and have a good holiday season ahead.

-Des

Desmond Bliek

403.370.2330 | desmond.bliek@gmail.com

Response P112-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P113 - Ovo Xxx

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P113

Comment P113-1 Dear Mr. Cory Zelmer, I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P113-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P114 - Hugo Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P114

Comment P114-1 I was wondering if your on-line outreach notices are available in Spanish language. Please let me know.

Response P114-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified).

Comment Letter P115 - Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P115

Comment P115-1 Hello, I haven't seen any response to my question yet. Could you please let me know the format of tomorrow's LA ART DEIR hearing at Union Station? Will there be a formal presentation and then a time for people to go up to a microphone to provide verbal comment?

Thanks, Phyllis Ling

> On Dec 7, 2022, at 1:08 PM, Phyllis Ling <pling@yahoo.com> wrote:

> Hello,

> Are both of the in-person DEIR public hearings for the LA ART Gondola (Aerial Rapid Transit project) being held in the "open house" format with various posters and kiosks stationed throughout the room? If so, how will people be able to make verbal public comment at these in-person meetings?

> I'm asking specifically about the meetings on December 10, 2022 and January 12, 2023.

> https://www.metro.net/calendar/laart-public-hearing-in-person/
<https://www.metro.net/calendar/laart-public-hearing-in-person/>
> https://www.metro.net/calendar/laart-public-hearing-in-person-2/
<https://www.metro.net/calendar/laart-public-hearing-in-person-2/>

Response P115-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to

review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment Letter P116 - Schenae Rourk

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P116

Comment P116-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P116-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P116-2 In addition, the goals of 35% for local, small, diverse, dvbe and lgbtq is a goal that Metro is also moving towards with their 48x28. They help with economic recovery and that is what we want for our communities.

Response P116-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for a discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter P117 - Christian D. Návar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P117

Comment P117-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P117-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P118 - Celeste Salazar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P118

Comment P118-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P118-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P119 - Anna Menedjian

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P119

Comment P119-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P119-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P120 - Casa Wilson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P120

Comment P120-1 My name is Casa Wilson, and I live at 419 Solano Avenue near Broadway. I'm writing to provide public comment on the proposed Dodger Stadium Gondola Project.

As a resident of this neighborhood, I am vehemently opposed to this project and very concerned that it's being pushed through with a private company that has links to Dodger Stadium and the McCourt family.

Although there seem to be very few details about the project, these ones concern me:

Response P120-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P120-2 The project would require the construction of those stations, a junction and a few towers, which Metro's EIR states "would result in significant and unavoidable impacts related to noise and vibration." Where? For how long?

Response P120-2 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. Tables 3.13-17 and 3.13 18 on pages 3.13-35 to 3.13-45 of Section 3.13, Noise, of the Draft EIR, show the locations where on-site construction noise impacts would occur during each phase of construction of the proposed Project, based on the L.A. CEQA Thresholds Guide and FTA analysis methods. Additionally, Tables 3.13-19 and 3.13-20 provide a summary of the proposed Project's construction impacts across all phases of construction of the proposed Project per the L.A. CEQA Thresholds Guide analysis and FTA analysis. As detailed therein, on-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include construction noise barriers. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and

human annoyance. Table 3.13-28 on page 3.13-62 of Section 3.13, Noise, of the Draft EIR, shows the location where on-site construction vibration impacts would occur during each phase of the construction of the proposed Project. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. As demonstrated in Table 3.13-28 on page 3.13-62 of Section 3.13, Noise, of the Draft EIR, the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project. Refer to Section 2.8, Construction, in Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project.

Comment P120-3 2. The project serves ONLY Dodger Stadium and, for the most part, baseball fans which already have a free transit option (the buses that run from Union Station). As the California Endowment has pointed out, this is a tourist stunt, not an actual, viable transit option that will widely serve the community. I imagine it will also go empty for half the year when there are no Dodgers games!

Response P120-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P120-4 3. The apparent conflict of interest between Drew McCourt's company and his family's ties to the Dodgers and the stadium

Response P120-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P120-5 4. The invasion of privacy for the residents of Chinatown and Solano Canyon. We're already facing a possible high rise apartment building development at the end of our street on Broadway (funded by another wealthy, connected L.A. family that owns the San Antonio Winery) that will bring more traffic and people to our quiet neighborhood. A gondola will mean that even the skies around our homes are taken up by money-grabbing developers, their projects, and their pollution.

Response P120-5 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P120-6 5. No details about what will happen to Radio Hill and the unhoused population that live there and if it will still be accessible to the residents of this neighborhood who hike there.

Response P120-6 Refer to Section 3.16, Parks and Recreational Facilities, of the Draft EIR for a discussion of access to Radio Hill Gardens. The proposed Project would not be located

within Radio Hill Gardens, with the closest proposed Project component (Stadium Tower) located approximately 275 feet east of Radio Hill Gardens. As discussed on page 3.16-13 of the Draft EIR, the two entrances to Radio Hill recreation area are located off Stadium Way and Bishops Road and Amador Street between Solano Avenue and SR 110. Although construction would require the temporary closure of Bishops Road, located south of Radio Hill Gardens, access to the area would be maintained as the trail entrance could be accessed via Cottage Home Street.

Comment P120-7 6. The fact that, once again, this neighborhood is being destroyed and sidelined in service to a baseball team, of all things. It seems like an especially audacious move, considering the history of how Dodger Stadium was built and the people who lost their homes for its construction.

Response P120-7 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P120-8 7. I've lived on both the Echo Park side and the Chinatown side of Dodger Stadium. The difference is stark and runs along class lines. When I lived on the Echo Park side, there were times I had to show my drivers license to even be allowed to enter the street I lived on on game days. On the Chinatown side, there are traffic cops that wave Dodger fans onto our tiny residential streets, despite the fact that there are signs all over the place that say "No Dodger Traffic Allowed" and "Local Access Only." To me it's clear that this gondola project is just another example of the disregard Dodger Stadium and the city of Los Angeles has for working class neighborhoods of non-native English speakers. There is no chance that a project like this (basically running buses over our heads on a daily basis for hours at a time) would be allowed

or even considered in a wealthy, gentrified neighborhood like Echo Park, and yet, it's being pushed through on our side with almost no public comment.

Response P120-8 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Further, no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for

discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding and during the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P120-9 8. I'm also concerned about more Dodgers Fans flocking to our neighborhood to ride the gondola. My apartment is next to an alley and the Cordoba Corporation parking lot. Every single game day, we deal with Dodgers fans getting out of their cars to urinate on our house and in the alley. Now they'll be over our heads, too.

Response P120-9 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment P120-10 9. What kind of light pollution should we expect from this project? If the gondolas are running after games or other events, does that mean we can expect a lit up transit system shining into our homes all day and night? Will it be lit 24-hours a day?

Response P120-10 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact

Assessment, of the Draft EIR. The proposed Project lighting would include low-level lighting for security and wayfinding purposes. Signage proposed for the exterior of the cabins is static non-illuminated signage. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. Additionally, the proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses.

Comment P120-11 Please consider that there are so many downsides for the people who live here and all in service of taking some baseball fans up a hill.

Please end this project. I'm cc'ing Eunisses Hernandez's website on this, as well, with the hope that she'll receive it as our new city council representative.

Response P120-11 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P120-1 through P120-10.

Comment Letter P121 - Renee Young

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P121

Comment P121-1 Dear Mr. Cory Zelmer, I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos. Sincerely, LA Resident

Response P121-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P122 - Katherine Chrisman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P122

Comment P122-1 Please take this project to heart and heart execute.As a homeowner here in West LA for 38 years I value this project for many reasons.

Response P122-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P123 - Daren Cole

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P123

Comment P123-1 Re: Los Angeles Aerial Rapid Transit Project

We would like to express our enthusiastic support for the proposed LA ART gondola system connecting Los Angeles Union Station and Dodger Stadium.

Leitner Poma has extensive experience as a manufacturer, as an operator, and investor in the cable-hauled mass transit sector (both for mountainous and urban environments). We feel confident that the Los Angeles Aerial Rapid Transit (LA ART) project would substantially enhance the safety and the reliability of public transit throughout the area, while enhancing the sustainability of public mass transit and featuring among the lowest cost per mile metrics.

To achieve the benefits of the technology, a capable and dedicated team is required. Our group has been able to work alongside the LA ART team during their planning process and can confirm that LA ART has assembled a highly competent team that has put forward a thoughtful plan that is feasible and buildable.

Furthermore, a gondola system is the safest and most reliable public transportation system for the route.

Safety is the most prominent feature of an aerial gondola. Indeed, a 2022 report of PWC (https://www.ewc.de/de/branchen-und-markte/oeffentlicher-sektor/pwc-studie-urbane-seilbahnen-im- oelsnv.pdf) highlights the following:

Aerial ropeways feature 1accident occurring every 10,563,000 miles travelled

In comparison, street cars display 1 accident every 139,808 miles, and buses have 1 accident every 382,764 miles.

Amongst our approx. 80 urban ropeways built worldwide, we have never experienced any major accidents nor vertical evacuations.

Gondola systems are extremely reliable, as the closed-loop system guarantees delay-free transportation on a uniform schedule with minimal wait times. Moreover, 3S (tricable) ropeways are designed for high passenger capacities allowing for hassle-free peak day / hour transportation, even during busy game days or events at the Stadium. Additionally, aerial gondolas have the capability to operate during windy days and at wind speeds of up to 62 MPH (dynamic wind pressure of 400 Pa), dramatically increasing the reliability of public transportation between Union Station and Dodgers Stadium. Leitner Poma has more than a century of experience in the cable transportation field, with more than 11,000 ropeways manufactured and installed worldwide, in ski resorts, entertainment, and urban settings. We have

pioneered gondolas to be used for public transportation, with approximately 80 systems built across the world, including:

- Roosevelt lsland Tramway in NYC
- Teleo 3S in Toulouse
- Cablebùs 2 in Mexico City
- Metrocable lines in Medellin

All of our ropeways have an availability rate of 99.956. Some relevant examples include, but are not limited to:

Zermatt 3S gondola on 12,700ft alt. in Switzerland, featuring a rope span of 1.7 miles between two towers, enduring wind speeds of up to 62 MPH on a daily basis https://www.youtube.com/watch?v=wPkAcAMgYoc.

Cablebus 2 gondola in Mexico City, which is the longest urban ropeway project on the planet, built on an earthquake-prone area without experiencing any disruption to the transit service (recently, an earthquake of the magnitude of 6.8 struck the area, without any disruption to the system besides a brief safety stop).

Toulouse 3S gondola which resembles the environment and use of the LA ART project, where our Group installed a tricable gondola to transport passengers from the Sabatier University (intermodal transit hub, connected to the local subway line) to the hospital (middle terminal) and the cancer research center Oncopole (end terminal) https://www.youtube.com/watch?v=EaDMDXp6df0.

In closing, we think the justifications for the gondola are many, and would expand as this new mode of transit gains traction and acceptance in the community. This is a positive change to typical American transit modes, and Los Angeles is poised to lead this shift toward a more efficient and sustainable zero emissions future.

Sincerely, -

Leitner-Poma of America, Inc.

Response P123-1 This comment letter indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Topical Response M, Comparable Urban Aerial Transit Systems, discussing numerous aerial transit systems in other locations around the world that serve as precedents for the proposed Project, such comparable systems demonstrate the versatility of aerial transit systems to operate in diverse environments and represent a sample of the numerous models for the proposed Project. Like such systems, the proposed Project would enable faster transit and facilitate commerce for businesses and consumers along the system alignment. This commenter, Leitner

Poma, is one of two manufacturers of 3S gondola systems in the world, and Metro and the Project Sponsor appreciate the company's support for the proposed Project.

Comment Letter P124 – Lauren Fortner

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P124

Comment P124-1 I am writing to express my support for the proposed aerial gondola project, as it carries significant benefits in terms of reducing traffic. The aerial gondola is a great alternative to driving and will provide a reliable alternative to clogged highways and congested streets in Los Angeles. By taking cars off of the roads, we can significantly reduce air and noise pollution, as well as improve the flow of traffic in our city.

By switching to renewable resources, we can help slow the effects of climate change and contribute to a healthier, cleaner, and more sustainable Los Angeles. I enthusiastically support the Los Angeles aerial gondola project and hope that you will give it due consideration.

Response P124-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P125 – Tara Kays

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P125

Comment P125-1 I am writing to express my support for the proposed aerial gondola project, as a passionate Dodgers fan. It is a fast and efficient means of transportation that provides easy access to Dodgers Stadium without having to be weighed down by congested traffic. The aerial gondola project will provide an enjoyable and stress-free ride for fans on game day!

Response P125-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P126 – Jessica Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P126

Comment P126-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P126-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P127 – Abraham Mercado

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P127

Comment P127-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P127-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P128 – Min Polley

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P128

Comment P128-1 I am writing to express my support for the proposed aerial gondola project, as it carries significant environmental benefits. The aerial gondola is a great alternative to both overground and underground rail systems due to its low construction and operational costs, as well as its minimal disruption of natural and existing urban environments.

The aerial gondola project is sure to help reduce air and noise pollution in Los Angeles, and I sincerely hope it gets approved.

Response P128-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P129 - Sharon Coleman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P129

Comment P129-1 Dear Mr. Cory Zelmer, I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos. Sincerely, LA Resident

Response P129-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P130 - Navid Nakhaee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference

Responses to P130

Comment P130-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P130-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P131 - Alejandro Herrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P131

Comment P131-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P131-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P132 – Michelle Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P132

Comment P132-1 Building a gondola will affect residents' life, privacy, and safety. It is infeasible to build a gondola close to residential houses. I hope the city government can stop it and bring a quiet and safe living environment back to me.

Response P132-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant.

Comment Letter P133 - Juniper Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P133

Comment P133-1 Hello,

I was in attendance for tonight's Zoom hearing regarding the LA ART proposed gondola. I believe the Cantonese interpreter padded one of the Chinese comments in his English translation.

This comment was given around the *6:49pm mark*. As a Cantonese speaker, I heard the caller say simply "I support the gondola. It is good for Chinatown." The interpreter then translates this to English saying she said "I support the gondola. It is good for local business." Which is not what the woman said and not the point she made.

I request you review all the Chinese verbal comments for this kind of inaccuracy. This is the second time I've experienced unfair treatment through the Chinese interpreters from LA Metro.

Response P133-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. In response to this comment, AECOM conducted an inquiry in conjunction with the consultant providing translation and interpretation services (LAT Multilingual) and summarized its results in a memorandum to Metro dated January 23, 2023.[4] As discussed therein, the results revealed that the initial interpretation from the virtual public hearing held on December 13, 2022, discussed in this comment, utilized a common translation of the Cantonese phrase used, and the comment thus was not “padded.” Refer to Attachment B to Appendix A, Public Outreach Report, of the Final EIR, for links to audio and video recordings of the December 13, 2022, virtual public hearing.

Comment P133-2 On Dec 10 at the Union Station hearing, I was in attendance with Cantonese seniors who submitted written public comment. The Cantonese interpreter at the front desk read one of these comments, came up to me afterwards, and said, in Chinese, that the comment was ineligible. That the senior "misunderstood" the project because her concern regarding affordability in the neighborhood did not apply. I asked him if he would still accept it, and he said yes, as he should have without question to begin with. I still do not understand why he did that as I find this unethical — to give this "feedback" knowing others around us could not understand him — but it did give me insight into what LA Metro considers "eligible" concern.

[4] AECOM. 2023. Memo documenting AECOM’s inquiry into public hearing translator comments.

I hope you will look into all of this, and realize how misguided this project is, from its very idea as a transportation solution, to the very conduct of the people who are supposed to provide accessibility.

Response P133-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. In response to this comment, AECOM conducted an inquiry in conjunction with the consultant providing translation and interpretation services (LAT Multilingual) and summarized its results in a memorandum to Metro dated January 23, 2023.[5] As discussed therein, LAT'S Multilingual interpreters stated that they did not take part in an interaction like the one described in the comment during the December 10, 2022, public hearing. The interpreters are certified and bound by a code of ethics that would prevent them from advocating a position in a setting such as this public hearing. The comment also describes the interpreter using male pronouns, but the Cantonese interpreters present at the December 10, 2022, public hearing, were both female. Refer to Appendix B, Public Hearing Transcripts, for transcripts of all verbal comments received on the Draft EIR during the two in-person public hearings. In addition, refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

[5] AECOM. 2023. Memo documenting AECOM's inquiry into public hearing translator comments.

Comment Letter P134 - Désirée Lenart

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P134

Comment P134-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P134-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P135 - Jorge Leandros Tovar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P135

Comment P135-1 I support the Gondola project, and I appreciate the goal of 35%, it's unprecedented for local, small, diverse, and DVBE businesses. We need economic recovery and this project can help.

Response P135-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment P135-2 Ultimately though, I'm not sure the path is the best path considering all the opposition to the project - especially from residents in the proposed area. I should be considered that the best path is not always a straight line. Additionally, the start and end location should be optimal locations. The path should be designed in a way that does not impede on residential peace, and the natural landscape, but will still add value to the City of Los Angeles.

I propose that we include an analysis study for optimal path in the EIR.

My firm is ready and able to perform and deliver on this analysis to be included in the EIR.

Please don't hesitate to contact me for further discussion.

Response P135-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would

convene stakeholder groups to coordinate on issues related to proposed Project features.

Refer to Section 2.0, Project Description, for discussion of the proposed Project alignment, which was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future land uses. As shown in Figure 2-8, the proposed Project alignment is not a straight line but would turn northwest at the Broadway Junction. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a "No Project Alternative," the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the Project Objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. The commenter does not provide any specific alternative alignment recommendations.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment Letter P136 – Diane Weiss

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P136

Comment P136-1 For heaven's sake!

Again, a billionaire wants a new ridiculous toy in his name and the city swallows all the green-washing hook, line & sinker and gets excited for another over-blown project which will NOT do what it promises to!

Response P136-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P136-2 Frank McCourt is selling you a lie. You really think a veeery slow-moving gondola is going to solve traffic problems to the Dodger games? When people have to drive and park at the stations? After the first game, when the over-priced novelty wears off, no one is going to take the extra time to stand in a gondola line possibly for over an hour, especially when they have to do the same thing in reverse when they're ready to just get home after the game. It will not be used! You will waste our precious open space, tax-payer money and invaluable environment for nothing if you go through with this horror!

Response P136-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on

the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data,

and the management of queuing at stations, and pre-game and post-game transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P136-3 Here the most important fact you should think of every time you have a stupid development plan in front of you:

In the last 50 years, the world has lost two-thirds, (2/3, or 60%) of our wildlife due to development and ruination of habitat. (https://www.worldwildlife.org/press-releases/69-average-decline-in-wildlife-populations-since-1970-says-new-wwf-report <https://www.worldwildlife.org/press-releases/69-average-decline-in-wildlife-populations-since-1970-says-new-wwf-report>)

We cannot afford frivolous, wasteful, vanity developments like this stupid gondola! At some point, we HAVE to stop being so greedy and short-sighted. This thing will disrupt wildlife all around this development, halting mating seasons, causing more undue stress on animals, causing the permanent loss of local wildlife. It will become a giant eyesore, destroying countless vistas from all over LA, including from some of our most beloved jewels of the city.

Response P136-3 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of how the proposed Project would not result in significant impacts to wildlife populations or to special status species and their habitats. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of certain trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. In the short-term, the removal of trees would result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relatively to the amount of habitat available in surrounding areas. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the

Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P136-4 We have to learn to treat our city with grace. This kind of ego-driven monster is a God-awful idea, presented by highly-skilled shysters who want you to believe their gold-digging is for your own good.

PLEASE STOP THE @#$%& GONDOLA.

Response P136-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P136-1 through P136-3.

Comment Letter P137 – Miguel Haro Jr.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P137

Comment P137-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P137-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P138 – Veronica Corona

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P138

Comment P138-1 I support the Gondola!

Response P138-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P139 – Jay Adriano

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P139

Comment P139-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P139-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P140 – Chinatown Station

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P140

Comment P140-1 Re: Comment Letter on the Draft EIR for the Los Angeles Aerial Rapid Transit Project

Dear Mr. Zelmer:

DLA Piper LLP (US) represents Chinatown Station Owner LLC ("CSO"), and is submitting this comment letter on CSO's behalf. CSO owns the properties located at 129-135 West College Street and 924 North Spring Street, Los Angeles, California (collectively, the "Property"). The Property is a 4.9-acre site located immediately adjacent to the proposed Chinatown/State Park Station for the proposed Los Angeles Aerial Rapid Transit Project ("Project") sponsored by LA Aerial Rapid Transit Technologies LLC ("Project Sponsor"). In March of 2019, the City of Los Angeles ("City") approved the Property for development of a seven-story building containing a maximum of 725 multifamily residential units and 51,600 square feet of commercial uses. All litigation challenging that approval has either been settled or finally concluded in the City's and CSO's favor, and development of the Property is proceeding.

Response P140-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-2 The Draft Environmental Impact Report dated October 17, 2022 ("Draft EIR"), prepared on behalf of the Los Angeles County Metropolitan Transportation Authority ("Metro") as lead agency for the Project, is defective under the California Environmental Quality Act ("CEQA," Pub. Res. Code, §§ 21000 et seq.) and its companion regulations ("CEQA Guidelines," Title 14, Cal. Code Regs., §§ 15000 et seq.) for the following reasons.

Response P140-2 This comment provides a general introduction regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P140-3 through P140-55. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P140-3 Metro's Draft EIR fails to fulfill its statutory purpose as an informational CEQA document. It does not adequately describe the Project, leaving key elements unspecified and consequently unexamined. It improperly engages in a piecemeal review rather than analyzing the impacts of the entirety of the true Project, and fails to consider how the Project reviewed in the Draft EIR is a part of, or precursor to, a future environmentally impactful project planned by the Project Sponsor including, without limitation, the redevelopment of the area on and surrounding the Dodger Stadium parking lot. The Draft EIR also unlawfully fails to address, much less analyze, the cumulative impacts of the Project together with this future project, and their potential growth-inducing impacts.

Response P140-3 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided in Responses P140-4 through P140-55. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P140-4 The Draft EIR not only fails to adequately describe and analyze the whole of the Project, its Project Description is also inadequate, unstable and missing material information. As more fully set forth below, the Draft EIR fails to adequately analyze impacts related to Air Quality, Historic and Archeological Resources, Noise, Transportation, and Aesthetics, and its mitigation measures are legally invalid under CEQA, for the reasons described below.

Metro is obligated by law to revise the Draft EIR to consider the impacts of the entirety of the true Project, and recirculate the Draft EIR, before considering its approval.

Response P140-4 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P140-5 through P140-55. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment P140-5 I. <u>THE DRAFT EIR INCLUDES AN INADEQUATE PROJECT DESCRIPTION</u>

The definition of the project analyzed in an EIR is critical to the sufficiency of that EIR under CEQA. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193 ("County of Inyo") (italics in original).) "'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment…." (CEQA Guidelines, § 15378.) The definition of the project must include not only the activities to be undertaken immediately, but also all "'reasonably

foreseeable' future activities related to the proposed project." (Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 428 ("Vineyard"); Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 396.

Response P140-5 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not address an environmental issue or raise a substantive issue on the content of the Draft EIR. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-6 An EIR is prepared under CEQA to describe and analyze the significant environmental effects of a project and discusses ways to mitigate or avoid the effects. (Id., § 15362.) The EIR's analyses must encompass all facilities and components necessary to the project. (Santiago County Water Dist. V. County of Orange (1982) 118 Cal.App.3d 818, 829-831 ("SCWD").) The EIR's project description cannot include a broad list of project purposes, some of which are never analyzed in the EIR. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1, 6 ("County of Inyo II").) If an EIR contains a project description that is unstable, or that fails to include components, facilities or actions integral to the project, or if the EIR fails to assess the potential impacts of purposes or components of the project included in the project description, the EIR's analyses and conclusions are undermined and the EIR is rendered invalid under CEQA. (See, e.g., Vineyard, supra, at p. 429; Santiago County Water Dist., supra, 118 Cal.App.3d at 829-831; County of Inyo II, supra.)

Response P140-6 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not address an environmental issue or raise a substantive issue on the content of the Draft EIR. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-7 A. <u>THE PROJECT DESCRIPTION IS UNSTABLE</u>

As described in the Draft EIR's Section 2.0, Project Description, the Project has two overall purposes: (1) to provide an aerial rapid transit option for people traveling from Union Station to events at Dodger Stadium (p. 2-42), estimated at only approximately 100 events per year (Section 2, Project Description, p. 2-10), and (2) to provide transit access for visitors to the Los Angeles State Historic State Park, and for commuters and residents in neighborhoods along the Union Station/Dodger Stadium route, including Elysian Park, Solano Canyon, Echo Park, Mission Junction, Chinatown and El Pueblo (Section 2, Project Description, pp. 2-13, 2-42). The Draft EIR explains that the Project is needed to reduce traffic congestion and associated pollution in and around Dodger Stadium and in the communities along the Project's alignment, which are

"disproportionately burdened with multiple sources of pollution." (Id., p. 2-10.) To serve these two purposes, the Project would operate daily from 6:00 a.m. to 12:00 a.m. (Id., p. 2-42).

Response P140-7 This comment provides a general recitation and characterization of Section 2.0, Project Description, of the Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Response P140-8 for a discussion of the Draft EIR's compliance with CEQA's requirements.

Comment P140-8 However, both logic and the statements and analyses in the Draft EIR demonstrate that the actual Project intended by the Project Sponsor is narrow – simply and only limited to the first purpose of replacing vehicle trips to Dodger Stadium with the Project for the 100 events per year. To the extent that the Draft EIR's analyses broaden to analyzing the Project's purported second goal of expanding transit service to the surrounding communities, the Draft EIR is defective for failing to provide a consistent and accurate Project Description. As the County of Inyo court noted, "[a] curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (County of Inyo, supra, 71 Cal.App.3d at 197-198.)

Response P140-8 The Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description, disclosing that the proposed Project would operate daily for surrounding communities in addition to providing service to Dodger games and any special events at Dodger Stadium. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed

Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. As discussed in Section 2.6, the proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership. The Draft EIR examined the potential environmental effects associated with implementation of the proposed Project on 20 environmental issue areas with detailed analysis based on Section 2.0, Project Description, of the Draft EIR. As the Project Description for the proposed Project complies with the requirements of Section 15124 of the CEQA Guidelines, the Project Description is adequate under CEQA and no further response is warranted.

Comment P140-9 Turning to logic first, the Project is not needed either to transport people to 100 events per year at Dodger Stadium, or to travel a route that currently is generally traveled by the Gold Line. The Gold Line already provides a transit option to alleviate traffic congestion and associated pollution for persons living in Chinatown and Mission Junction; similarly, transit options available at Union Station already serve the El Pueblo neighborhood.

Response P140-9 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the

fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P140-10 Nor could the Project provide a transit option at Dodger Stadium for persons living in the Elysian Park and Solano Canyon neighborhoods, despite the Project Description's representation (p. 2-10); to the contrary, as disclosed at page 2-39 and in Section 3.17, Transportation, at page 3.17-26, the Project and its Dodger Stadium Station cannot provide connectivity to the Elysian Park and Solano Canyon neighborhoods because there is no assurance that the Project Sponsor would be able to negotiate the necessary "potential mobility hub" in the future at Dodger Stadium. Without that mobility hub, there is certainly no need for the Project to operate daily from 6:00 a.m. to 12:00 a.m. to serve a non-existent transit option for the neighborhoods near Dodger Stadium. Similarly, the Project would not serve Echo Park or Mission Junction as there are no proposed stops in those neighborhoods.

Response P140-10 The Draft EIR addressed mobility hubs in Section 2.0, Project Description of the Draft EIR. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The proposed Project would provide access to the Mission Junction neighborhood via the Chinatown/State Park Station, which also includes a mobility hub.

Comment P140-11 Therefore, logically, the Project is only needed to transport people to Dodger Stadium, as a transit option that can "overcome grade and elevation issues" (Section 2.0, Project Description, p. 2-12). As such, there is no need for the Project to operate daily from 6:00 a.m. to 12:00 a.m. and to build a Chinatown/Los Angeles State Historic Park station and associated "amenities" in the park ("Chinatown Station").

Response P140-11 Refer to Response P140-9 for a discussion of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Due to the length and geometry of the proposed Project alignment, the Chinatown/State Park Station at its proposed location would support the proposed Project's objective to maximize the proposed Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- / last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would operate daily to serve existing residents, workers, park users (including those attending special events at the Los Angeles State Historic Park such as concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and visitors to Los Angeles.

Comment P140-12 Although the scope of the Draft EIR's analyses varies from broad to narrow, much of the Draft EIR's content is limited to assessing the impacts of the narrow Project, focused only on the impacts of a Project that would eliminate vehicle trips to Dodger Stadium. The majority of the Purpose and Need section of the Project Description discusses the history of Dodger Stadium, its configuration, and its traffic congestion, with only one paragraph devoted to purported unserved neighborhood transit needs. (Section 2.0, Project Description, pp. 2-10, 2-12.) The Project Description lists 13 Project Objectives, seven of which explicitly address reducing vehicle trips to and

congestion at and around Dodger Stadium; the majority of the remainder address the benefits of the sustainability and route of the gondola, itself. (Id., pp. 2-12 – 2-13.)

Response P140-12 Pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. Section 2.0, Project Description, of the Draft EIR, included a description of all integral components of the proposed Project for the environmental analysis, enabling Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, to fully analyze and disclose all impacts of the proposed Project, and Section 4.0, Alternatives, of the Draft EIR, to consider potential alternatives to the proposed Project. Section 2.0, Project Description, of the Draft EIR contains the specific descriptions of the proposed Project required pursuant to CEQA Guidelines Section 15124, including a description of the proposed Project's location (Draft EIR, § 2.3), a statement of the project objectives (*id*., § 2.3.8), a description of the project's technical and environmental characteristics (*id*., §§ 2.2, 2.4 to 2.9), a discussion of the intended uses of the EIR (*id*., § 1.2), and a list of the project approvals that will be required (*id*., § 2.10).

Pursuant to Section 15165 of the CEQA Guidelines, each component of the proposed Project, e.g., each station, tower, and junction, are identified within the Draft EIR and their impacts analyzed. In addition, Section 2.0, Project Description recognizes that the proposed Project will serve different types of riders, noting that in addition to providing an aerial rapid transit option for visitors to Dodger Stadium, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Section 2.0 also recognizes the ancillary features of the proposed Project, including pedestrian improvements, amenities at the Los Angeles State Historic Park, and mobility hubs at both the Chinatown/State Historic Park Station and Dodger Stadium Station. The scope of the proposed Project provided in the 62 pages of detailed description in Section 2.0 constitutes the whole of the action considered as the proposed Project for the Draft EIR's analysis. This proposed Project remains consistent throughout the Draft EIR, which analyzes and discloses the potential environmental impacts of this proposed Project in 7,877 pages of detailed analysis from experts in their respective fields, providing mitigation as necessary for potentially significant impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Contrary to the commenters statement that "much of the Draft EIR's content is limited to assessing the impacts of the narrow Project, focused only on the impacts of a Project that would eliminate vehicle trips to Dodger Stadium", the Draft EIR examined the potential environmental effects associated with implementation of the proposed Project on 20 environmental issue areas with detailed analysis as follows: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise,

Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire, examining for each issue area the regulatory setting, environmental setting, methodology, environmental impacts, and as applicable, mitigation measure and level of significance after mitigation.

For example, consistent with the Project Description, Section 3.17, Transportation, of the Draft EIR, analyzed different ridership types in order to calculate the estimated VMT for the proposed Project. As discussed in Section 3.17.3, Methodology, of the Transportation analysis, ridership estimates included "a number of distinct market segments including: Dodger Stadium game and event attendees, employees, tourists, neighborhood riders, and Los Angeles State Historic Park visitors and event attendees." In addition to Dodger Stadium game and event attendees, as discussed on page 3.17-34 in Section 3.17, Transportation of the Draft EIR, it is estimated that ridership from nearby neighborhoods would range between 200 and 575 riders (400 to 1,150 trips for round-trip), and the daily number of tourists who would ride the proposed Project is estimated to vary between 1,265 tourists and 3,370 tourists. As discussed on page 3.17-26, ridership for the daily park use is included in the ridership estimates for neighborhood riders. Table 3.17-4, Proposed Project Estimated Daily Riders, provides the daily weekday riders and daily weekend riders for Dodger Stadium access, other special events, and neighborhood riders (inclusive of neighborhood/regional and daily Park access). Refer to Section 3.17.4, Transportation of the Draft EIR for a detailed discussion of potential impacts of the proposed Project on the existing surrounding communities, including an overall reduction in vehicle miles traveled (VMT).

Comment P140-13 Many of the critical impact analyses in the Draft EIR are similarly limited assessing the effects of the Project at Dodger Stadium, without regard to the effects of providing transit to and reducing congestion and pollution in the communities along the Project's route. For example, the analysis of the Project's operational air quality impacts in Section 3.3, Air Quality, uses mobile source baseline information consisting of the 2019 "vehicular emissions associated with games and special events associated with Dodger Stadium resulting from passengers and vehicles traveling to the game along with employees" (p. 3.3-22). Similarly, the greenhouse gas ("GHG") emissions reduction analysis in Section 3.8, Greenhouse Gas Emissions, also focuses exclusively on Dodger Stadium (pp. 3.8-17 - 3.8-18). The technical reports supporting both sections clearly state that the operations scenarios assume, for mobile source emissions:

> "the availability and use of the gondola system would decrease the number of people traveling to Dodger Stadium (and surrounding areas) in passenger vehicles and increase the number of people using transit. This shift in transportation mode would reduce total VMT and vehicle idling time in and around Dodger Stadium, associated with passenger vehicles."

(Appendix D, Air Quality/Health Risk Assessment, p. 23; Appendix J, GHG, p. 25.) The GHG Section uses the same 2019 mobile source baseline information from Dodger Stadium and future mobile source estimates that the Air Quality Section used. (See Section 3.8, p. 3.8-x; Appendix D, AQ-J, p. 25.)

Response P140-13 As discussed in Response P140-12, the Draft EIR's analysis considers the whole of the proposed Project described in Section 2.0, Project Description, of the Draft EIR. For example, as discussed on page 3.3-22, of the Draft EIR, "[t]he proposed Project would also result in operational emissions associated with buildout and originate from area sources (e.g., landscaping-related fuel combustion sources, consumer products, and architectural coatings), energy use, and mobile sources." "Build-out and horizon year mobile emissions utilize vehicle miles traveled and trip estimates prepared by Fehr & Peers alongside emission factors for light-duty vehicles," and "the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions." As noted on page 3.17.34 and 3.17.35 of Section 3.17, Transportation of the Draft EIR, the proposed Project would generate neighborhood ridership that would reduce vehicle miles traveled (VMT), but to provide a more conservative analysis, only the VMT benefits of the proposed Project were calculated on Dodger Stadium game/event days. Accordingly, while the VMT for other ridership scenarios was calculated, the Draft EIR conservatively only assumes VMT reductions from Dodger Stadium game and event ridership in its analysis, including in Section 3.03, Air Quality and Section 3.08, Greenhouse Gas Emissions, of the Draft EIR. Including VMT reductions from other ridership sources analyzed (e.g., neighborhood riders, tourists) would provide additional air quality and greenhouse gas emissions reductions benefits which were conservatively not assumed in the Draft EIR's analysis.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through

reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Due to the COVID-19 pandemic, the 2019 Major League Baseball season was the most recent season with fans in attendance at the time of the Notice of Preparation for the Draft EIR and while the Draft EIR was under preparation that included a full season of games at Dodger Stadium with fans in attendance. Therefore, as noted, in Section 3.17, Transportation of the Draft EIR, data regarding game attendance from the 2019 season with fans in attendance was used in the estimation of VMT.

Comment P140-14 By contrast, in Section 3.17, Transportation, the Draft EIR's analyses broaden to include the Project's purported second purpose by, among other things, estimating future ridership from the neighborhoods along the Project's alignment and from tourists (pp. 3.17-25 – 3.17-26).

Response P140-14 The Draft EIR consistently analyzes the whole of the proposed Project, including the whole of the system (including each station, junction, and tower), its operations, and any ancillary features. Where necessary, the Draft EIR focuses on the component that would potentially affect the environment in the relevant subject area, as discussed in Response P140-12. Section 2.0, Project Description recognizes that the proposed Project will serve different types of riders, noting that in addition to providing an aerial rapid transit option for visitors to Dodger Stadium, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Consistent with the Project Description, Section 3.17, Transportation, of the Draft EIR, analyzed different ridership types in order to calculate the estimated VMT for the proposed Project. As discussed in Section 3.17.3, Methodology, ridership estimates included "a number of distinct market segments including: Dodger Stadium game and event attendees, employees, tourists, neighborhood riders, and Los Angeles State Historic Park visitors and event attendees." The proposed Project would serve a variety of market segments as detailed on pages 3.17-33 to 3.17-35, including neighborhood riders and tourists. As discussed on page 3.17-36, tourist riders are not expected to generate net new VMT as the proposed Project would be capturing a share of the existing tourist market to Downtown Los Angeles. As noted on page 3.17.34 and 3.17.35, the proposed Project would generate neighborhood ridership that would reduce VMT, but to provide a more conservative analysis, the VMT benefits of the proposed Project were only calculated for Dodger Stadium game/event days. Refer to Response P140-19 for further discussion of the tourism ridership analysis. Accordingly, the Draft EIR does not artificially narrow the Project Description in order to minimize the proposed Project's impacts, but rather does not include certain potential benefits of the proposed Project's VMT reductions in order to provide a more conservative analysis.

Comment P140-15 The Draft EIR's shifts between analyzing different project descriptions proves that the Draft EIR's Project Description is unstable and, therefore, that the Draft EIR fails under

CEQA "as a vehicle for intelligent public participation." (County of Inyo, supra, 71 Cal.3d at pp. 197-198.).

Response P140-15 The Draft EIR does not shift between analyzing different Project Descriptions. The Draft EIR consistently analyzes the whole of the proposed Project, including the whole of the system (including each station, junction, and tower), its operations, and any ancillary features. Where necessary, the Draft EIR focuses on the component that would potentially affect the environment in the relevant subject area, as discussed in Response P140-12. As discussed in Response P140-12, pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. The analyses of the Draft EIR are based on the entirety of the Project Description provided in Section 2.0, and as discussed in Response P140-12 the Draft EIR's analysis is consistently based on the accurate, stable, and finite Project Description provided in Section 2.0. Because the Project Description for the proposed Project complies with the requirements of Section 15124 of the CEQA Guidelines, the Project Description is adequate under CEQA, and no further response is warranted. Refer to Response P140-23 for further discussion of how the Draft EIR complied with CEQA's Project Description requirements to allow for informed public participation.

Comment P140-16 B. <u>THE PROJECT DESCRIPTION IS MISSING KEY INFORMATION</u>

The Project Description also omits and fails to adequately describe key elements of the Project, the omission of which leads to a failure to assess the Project's full impacts. For example, there is no depiction of the Project's profile in Project Description – no information regarding how the Project's stations and towers will appear, how high the stations and towers will be, how high the gondolas would run, and the ascending and descending heights of the gondolas as they depart from and approach the stations. The only depiction of this critical information is buried in an appendix, Appendix Q, Proposed Alignment Plan and Profile. The profile is included as the final page of this appendix and provides critical information regarding the height from which the gondolas would be descending into the Chinatown Station and the height to which the gondolas would be ascending from the Chinatown Station. This information, in turn, directly affects the level of impact on the future residents of the Property, particularly the noise and aesthetics impacts. On "game days," when the gondolas would be running every 23 seconds, these impacts would be significant; however, the Draft EIR fails even to consider them.

Response P140-16 Refer to Section 2.0, Project Description, of the Draft EIR for information regarding the proposed Project components, including figures depicting how the proposed Project's stations and towers will appear and their heights. Refer to Figure 2-11: Alameda Station Cross Sections, Figure 2-13: Alameda Tower Elevations, Figure 2-15: Alpine Tower Elevations, Figure 2-18: Chinatown/State Park Station Cross Sections, Figure 2-20: Broadway Junction Cross Sections, Figure 2-22: Stadium Tower

Elevations, and Figure 2-25: Dodger Stadium Station Cross Sections. Refer to Table 2-2: Proposed Project Station and Junction Details, and Table 2-3: Proposed Project Tower Details, on page 2-43 in Section 2.0 for the proposed heights of the stations and towers. Additionally, refer to Figure 2-5 and 2-6 on Pages 2-15 and 2-16 for illustrative designs of the proposed stations and towers. Section 2.5.1, Proposed Project Alignment, of the Project Description, discussed the proposed Project profile, stating that "the proposed alignment profile is provided in *Proposed Alignment Plan and Profile* (Appendix Q)." The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. Such documents were clearly organized and did not require the public to sift or hunt for such information. Refer to Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, which addresses the potential environmental effects of the proposed Project's operations. As stated on page ES-17, in the Executive Summary, of the Draft EIR, proposed Project would not result in any significant and unavoidable operational impacts, including to aesthetics and noise and vibration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of operational noise impacts from the proposed Project, which would be less than significant.

Comment P140-17 As another example, the Project Description mentions in passing that the gondolas would "be equipped with privacy glass that can become opaque while adjacent to sensitive views." (Section 2.0, Project Description, p. 2-18.) "Privacy glass" and "sensitive views" are not defined and nothing further is said. However, this statement tacitly acknowledges that the Project would significantly adversely affect sensitive land uses and receptors – including the future residents of the Property. Also buried in an appendix, Appendix M, Noise and Vibration Report, again as the final page of that appendix, is the information that the gondolas would run just 35 feet from the windows of the Property's residents. Gondolas filled with up to 40 persons running by the windows of the Property's residents every 23 seconds on "game days" would create a significant environmental impact on those residents (as well as an invasion of privacy) that is not analyzed in the Draft EIR.

Response P140-17 Refer to Section 2.0, Project Description, Figure 2-8: Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property for a depiction of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property, Figure 2-17: Proposed Chinatown/State Park Station Location, showing the proposed Project's proximity to North Spring

Street and the "Approved Mixed-Use Project" (i.e., College Station), and Figure 2-29: Chinatown/State Park Station Buildout Conditions, depicting the proposed Project's proximity to the "Approved Mixed Use Project" (i.e., College Station). Accordingly, the Draft EIR clearly disclosed the proximity of the proposed Project to existing development and the approved College Station project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and, modern aerial transit systems in other cities, including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR. As discussed in Section 3.01, any references to and analysis of residential views and resident viewer groups, which are assumed to be associated with private residential properties, are provided in the Draft EIR for informational purposes, as the L.A. CEQA Thresholds Guide does not protect private views from residential properties. As discussed in Section 2.0, Project Description, of the Draft EIR, standard operating hours would be between 6:00 AM and 12:00 AM, subject to operational changes due to ridership demand. As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Analysis, of the Draft EIR, due to anticipated nighttime operations, operational impacts were analyzed and compared against both daytime and nighttime ambient conditions. Noise impacts from operations of the proposed Project would be less than significant. As shown in Tables 3.13-22 through 3.13-26 beginning on page 3.13-54 of the Draft EIR, project operations would not exceed applicable daytime or nighttime thresholds and impacts would be less than significant.

Comment P140-18 The omitted information regarding the privacy glass, how and when it would become opaque while adjacent to sensitive views, and what would be considered to be sensitive views is critical to both a legally sufficient Project Description and a

comprehensive analysis of the Project's impacts under CEQA, even under the limited scope of the Project addressed in many of the Draft EIR's sections.

Response P140-18 Refer to Response P140-17 for a discussion of sensitive views and privacy glass. As discussed in Response P140-12, pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts.

Comment P140-19 Additionally, the Project Description fails to disclose that the Project is relying heavily on what the Draft EIR admits are uncertain ridership projections for tourists to justify the planned 6:00 a.m. to 12:00 a.m. schedule. While the Project Description does list tourists among the list of expected ridership sectors (Section 2.0, Project Description, p. 2-42), the Draft EIR discloses fundamental uncertainties regarding this sector. The existence of this ridership sector would depend on the Project "capturing a share of the existing tourism in Los Angeles;" and the size of this sector "would not be consistent on a daily basis and would be variable depending on the seasonality of tourism in Downtown Los Angeles" and further, on game days, game day riders with pre-paid timed tickets on the gondola would have priority boarding over tourists. (Section 3.17, Transportation, p. 3.17-25.) Even so, Table 3.17-4 in Section 3.17, Transportation, discloses that the Project is relying on substantial projected tourism-generated ridership to support it:

- 2,575 tourism-generated riders to the Dodger Stadium station on a low weekday in both 2026 and 2042, as compared to
    - 1,225 neighborhood riders to all destinations in 2026 and
    - 1,625 neighborhood riders to all destinations in 2042;
- 3,570 tourism-generated riders to the Dodger Stadium station on a low weekend day in both 2026 and 2042, as compared to
    - 720 neighborhood riders to all destinations in 2026 and
    - 920 neighborhood riders to all destinations in 2042

Response P140-19 As is typical of all public transit, operating schedules and frequencies of the service would ultimately be optimized to meet ridership demand. The commenter overstates the reliance on tourist riders to justify the operating schedule. As noted on page 2-42 in Section 2.0, Project Description, of the Draft EIR, tourist riders are one of five ridership markets anticipated to ride the system, including:

- Dodger game/Stadium event attendees;
- Dodger game/Stadium event employees;
- Tourists or others who want to ride ART;
- Visitors to the Los Angeles State Historic Park and Elysian Park; and

- Commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon.

Independent of ridership demand by a particular market segment, for the proposed Project to provide effective public transit on non-game days, in particular for commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon, and game days outside of peak travel to/from Dodger Stadium, it would provide a sufficient span of service similar to the rail and bus transit serving LAUS. As noted on page 3.17-36 of Section 3.17, Transportation, of the Draft EIR, tourist riders are not expected to generate net new VMT associated with the proposed Project, as the proposed Project would capture a share of the existing tourist market to Downtown Los Angeles. Conversely, the proposed Project would not reduce tourist related VMT. Therefore, the Draft EIR is not reliant on tourism ridership for the quantification of any of the VMT and resulting air quality and greenhouse gas reduction benefits of the proposed Project. Typical practice for ridership estimates for proposed transit projects is to include average weekday ridership. The Draft EIR exceeds this typical practice by providing both weekday and weekend ridership estimates, as well as game day and non-game day estimates, and ridership estimates with events at the Los Angeles State Historic Park, as shown on page 3.17-35 of the Draft EIR. This indicates the range in expected ridership for the proposed Project for typical average days of the types described above.

As detailed in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles. The HR&A Analysis of Potential LA ART Tourist Ridership is included in Appendix N. Additionally, as noted on page 13-14 of the Appendix N Ridership Model Development memo, "Tourism ridership would not be consistent on a daily basis and would be variable depending on the seasonality of tourism in Downtown Los Angeles. However, in a tourism market as large as Los Angeles, the variation is not expected to be substantial, so in order to estimate average daily tourist riders, Fehr & Peers divided the annual number by 365 since the proposed Project would operate every day of the year."

Comment P140-20 The tourism-generated ridership numbers are ostensibly supported by Appendix N, Transportation, but a reader searching for that support must look farther to an attached four-page report prepared by HR&A Advisors, Inc. ("HR&A"). HR&A's report purports to estimate the likely number of tourists who would utilize the gondola per year; while this report lists a number of gondolas and trams currently operating worldwide and purports to separate the commuter ridership from the tourist ridership for each and to identify the characteristics that attract tourists, at the end, the report's estimate that 915,000 tourists would use the Project per year is based on an undisclosed calculation. (Appendix N, HR&A Analysis, p. 4.) As such, this estimate

constitutes mere speculation and unsubstantiated opinion and narrative. Moreover, the Draft EIR cannot rely on information "buried in an appendix" to carry out its obligation under CEQA to inform the public. (Santa Clarita Organization for Planning the Environment v. County of Los Angeles (2003) 106 Cal.App.4th 715, 722-723 (holding that an EIR is inadequate where information "is scattered here and there in EIR appendices.").)

Response P140-20 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Response 140-19 for a discussion of the tourist analysis prepared by HR&A. The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. Such documents were clearly organized and did not require the public to sift or hunt for such information. For example, page 3.17-25 of Section 3.17, Transportation, of the Draft EIR clearly states that the ridership model inputs and parameters used in model development and calibration and ridership testing are provided in Appendix N. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Further, per CEQA Guidelines section 15003 (i), CEQA requires adequacy, completeness, and a good-faith effort at full disclosure in an EIR. Under CEQA Guidelines section 15151, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P140-21 The Project cannot justify its 18-hour schedule and Chinatown Station, much less its significant and unmitigated impacts as discussed below, with ridership figures that are inflated with uncertain and speculative tourism-generated numbers. Further, as discussed above, the neighborhood ridership numbers are also speculative, particularly since the Project does not contain a mobility hub at the Dodger Stadium station on which the currently unserved neighborhoods would depend. Moreover, even if the tourism-generated ridership numbers were considered valid, those riders are expected to travel to the Dodger Stadium station, only, which assumption again demonstrates that the Project has only a single purpose – the development of a gondola between Union Station and Dodger Stadium to eliminate vehicle trips to Dodger Stadium.

Response P140-21 As detailed in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, the proposed Project would have less than significant operational impacts. Refer to Response P140-19 regarding tourism ridership and for discussion of how in order for the proposed Project to provide effective public transit in particular for commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon, the proposed Project needs to provide a sufficient span of service similar to the rail and bus transit serving LAUS. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P140-22 As discussed further below, the Project Description also omits a critical portion of the Project that is planned as a later phase, the impacts of which must be analyzed as part of the Project or otherwise in conjunction with the Project's impacts. (Citizens Assn. for Sensible Dev. of Bishop Area v. Cty. of Inyo (1985) 172 Cal.App.3d 151, 165-166.) The Project Description also refers to, but omits, Figures 2-30 through 2-32.

Response P140-22 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project

Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The proposed Project does not propose development outside of that identified in Section 2.0, Project Description, of the Draft EIR. Pursuant to Section 15165 of the CEQA Guidelines, each component of the proposed Project, e.g., each station, tower, and junction, are identified within the Draft EIR and their impacts analyzed. Section 5.0, Other CEQA Considerations, of the Draft EIR, includes an analysis of the proposed Project's cumulative effects. Furthermore, Figures 2-30 through 2-32 are included on pages 2-58, 2-59, and 2-60 of the Draft EIR, and were not omitted.

Comment P140-23 The omissions from the Project Description carry through into each of the environmental impact discussions in the Draft EIR, rendering the analysis of each topic addressed invalid in the absence of sufficient information about the Project. Without these critical facts about the Project itself, the Draft EIR fails as an informational document. It fails to conduct a valid CEQA analysis of the potential environmental impacts caused by the Project, and likely fails to identify potentially significant impacts. The description of the Project is the foundation of the Draft EIR. The fact that the Project Description here is fatally inadequate is sufficient to invalidate the entire Draft EIR. (See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 729-730 (EIR set aside for failure to analyze the whole project).)

Response P140-23 Pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. Section 2.0, Project Description, of the Draft EIR, included a description of all integral components of the proposed Project for the environmental analysis, enabling Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, to fully analyze and disclose all impacts of the proposed Project, and Section 4.0, Alternatives, of the Draft EIR, to consider potential alternatives to the proposed Project. Section 2.0, Project Description, of the Draft EIR contains the specific descriptions of the proposed Project required pursuant to CEQA Guidelines Section 15124, including a description of the proposed Project's location (Draft EIR, § 2.3), a statement of the project objectives (*id*., § 2.3.8), a description of the project's technical and environmental characteristics (*id*., §§ 2.2, 2.4 to 2.9), a discussion of the intended uses of the EIR (*id*., § 1.2), and a list of the project approvals that will be required (*id*., § 2.10). Pursuant to Section 15165 of the CEQA Guidelines, each component of the proposed Project, e.g., each station, tower, and junction, are identified within the Draft EIR and their impacts analyzed.

Comment P140-24 <u>II. THE DRAFT EIR'S PROJECT DESCRIPTION ENGAGES IN IMPROPER PIECEMEALING AND FAILS TO CONSIDER CUMULATIVE AND GROWTH-INDUCING IMPACTS</u>

The requirements of CEQA cannot be avoided by piecemeal review that results from "chopping a large project into many little ones-each with a minimal potential impact

on the environment-which cumulatively may have disastrous consequences." (Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 283–284.) Such segmented, or "piecemealed," environmental reviews also "eliminate the opportunity to mitigate interactive impacts effectively." (Tuolumne County Citizens for Responsible Growth v. City of Sonora (2007) 155 Cal.App.4th 1214, 1230-1231.) A CEQA document must define the scope of a project to include future phases or expansions where: (1) they are reasonably foreseeable consequences of the initial project; and (2) the future phase or expansion will be significant in that it will change the scope or nature of the initial project or its environmental impacts. (Laurel Heights Improvement Assoc. v. Regents, supra, 47 Cal.3d at p. 396.) Courts have also established that an activity falls within the scope of a project if it is among "various steps which taken together obtain an objective" (Tuolumne County Citizens, supra, at p. 1226), or if the activity is a crucial functional element of the larger project such that, without it, the larger project could not proceed (San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus (1994) 27 Cal.App.4th 713, 731,-732).

Additionally, CEQA requires an analysis of the "cumulative impacts" from interconnected or related projects. (CEQA Guidelines § 15355; Las Virgenes Homeowners Federation, Inc. v. County of LA (1986) 177 Cal.App.3d 300, 306.) "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (Los Angeles Unified School Dist. v. City of Los Angeles (1997) 58 Cal.App.4th 1019, 1024-1025 (emphasis added).) CEQA also requires an analysis of "growth-inducing impacts," which assesses the ways in which a project could foster economic or population growth, or future residential or commercial, either directly or indirectly, in the surrounding environment. (CEQA § 21100(b)(5).)

Response P140-24 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-25 The Draft EIR fails to recognize that the Project is, in reality, a component of a larger plan to redevelop the current parking lot at Dodger Stadium into a different use and to assess the potential impacts of the whole of that Project. The Draft EIR's Project (whether narrowly or more broadly defined in the Draft EIR) is simply the first step in the true Project – eliminating the parking lot to make way for the redevelopment. Evidence of this plan has been in the public domain for more than a decade.

Response P140-25 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues – has been well established.

Comment P140-26 The Project Description generally describes the Project as an aerial gondola system, spanning only approximately 1.2 miles, consisting of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins. (See, e.g., Section 2.0, Project Description, pp. 2-1.) However, the DEIR fails to disclose that the owner of the Dodger Stadium parking lot has plans to build a significantly larger project to redevelop the area on and around the parking lot with a museum, shops and parking garages. (See Exhibit 1, Dodgers remains fans of football & real estate development, The Eastsider, dated February 25, 2022.) [According to published reports, a court filing reveals that the Dodgers have a $500 million redevelopment plan that would be serviced by the Project, and even the long-term lease agreement for the parking lot includes provisions for future plans for Dodger Stadium, including the development of offices, shops and entertainment uses.

Response P140-26 This response takes into consideration the comment's referenced Exhibit 1. Refer to Response P140-25 for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Further, as discussed in Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, the adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed, and no environmental analysis is required of the speculations of commenters. As also discussed in Topical Response G, the "Next 50" project referenced in this comment was proposed over 15 years ago, and did not proceed after 2008. The current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR. As discussed in Topical Response G, the purported "future" development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and

zoning, permits, and approvals, including potentially environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed.

Comment P140-27 (See Exhibit 2, Tear Up the Dodger Stadium Parking Lot, Legal Planet, dated November 2, 2018.) A prominent architecture firm even describes and advertises on its website the Dodgers plans to build a new urban plaza, office building and interactive museum. The development plan boasts a new eight level, 900 car parking structure and a series of food service/retail concession clusters. (See Exhibit 3, available at: https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/.) Here, the Draft EIR fails to analyze, much less even mention, the anticipated future uses at the Dodger Stadium parking lot and the likely effects of those uses, that the Project would make possible.

Response P140-27 This response takes into consideration the comment's referenced Exhibits 2 and 3. Refer to Responses P140-25 and P140-26 for a discussion of how the proposed Project solely proposes an aerial gondola system and does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property, as well as for a discussion of the "Next 50" project and how any "future" development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and zoning, permits, and approvals, including potentially environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed. Mere statements on a website are not evidence that such development is currently proposed, nor are they sufficiently firm or committed to such that environmental analysis is required. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit "foreseeable" development from its analysis, and CEQA expressly discourages such speculation.

Comment P140-28 Further, while the Draft EIR addresses growth-inducing impacts, its discussion is narrowly focused on whether the Project would induce population growth or residential development, and completely ignores the language in Section 15126, subdivision (e) instructing that "the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively" should also be discussed. (CEQA Guidelines, § 15126(e).) The Project would clearly "encourage and facilitate" the future plans to redevelop the Dodger Stadium parking lot with commercial uses, and the potential impacts of that future component of the Project should have been assessed.

Response P140-28 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 5.4, Growth-Inducing Impacts, of Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of the potential growth-inducing impacts of the proposed Project as required by

Public Resources Code section 21100(b)(5). Pursuant to CEQA Guidelines Section 15126.2(e), an EIR need only discuss "the ways in which" the proposed project could foster growth, and accordingly does not require an EIR to provide a detailed analysis of the proposed project's effects on growth. A general analysis is sufficient. The Draft EIR's growth inducing analysis considered the potential growth-inducing impacts from the proposed Project in pages 5-57 through 5-60 of the Draft EIR, concluding that construction and operation of the proposed Project would result in less than significant growth inducing impacts, with respect to whether the proposed Project would foster population or employment growth, or the construction of additional housing, either directly or indirectly, on both a regional and local scale. As discussed in Section 5.4, and as noted in this comment, the proposed Project does not remove obstacles to growth but instead would increase connectivity in the densely urbanized downtown Los Angeles and provide direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. As discussed in Section 3.14, Population and Housing, of the Draft EIR, approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. Refer to Response P140-9 for a discussion of the need for the proposed Project. Given that the area in the City where the proposed Project alignment is located is densely urbanized and there are existing planned developments for the area, the proposed Project would be a benefit for existing and planned uses in the area.

Refer to Responses P140-25 through P140-27 for a discussion of how the potential for development at Dodger Stadium is not reasonably foreseeable because the proposed Project solely proposes an aerial gondola system and does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property, which is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated in this comment. Accordingly, the Draft EIR's growth inducing analysis need not consider speculative potential impacts pursuant to CEQA Guidelines 15145.

Comment P140-29 The failure of the Draft EIR to address and analyze the impacts of the Project together with this foreseeable future project as either being part of the Project, or as "closely related past, present, and reasonably foreseeable probable future projects" creating cumulative impacts, or under the Project's growth-inducing impacts, is a fundamental violation of CEQA that infects each of the Draft EIR's impact analyses and renders the Draft EIR void as an informational document. (See Los Angeles Unified School Dist., supra, 58 Cal.App.4th at pp. 1024-1025.)

Response P140-29 Refer to Response P140-28 for a discussion of the Draft EIR's growth-inducing impacts analysis, and how the potential for development at Dodger Stadium is not reasonably

foreseeable and therefore not required to be analyzed. The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment P140-30 III. THE DRAFT EIR'S ANALYSES OF THE PROJECT'S AIR QUALITY AND GREENHOUSE GAS EMISSION IMPACTS ARE LEGALLY DEFICIENT

As discussed above, the Draft EIR's analyses of the Project's operational impacts on Air Quality and GHG emissions are defective because they fail to assess the potential impacts of the entire Project not only with respect to future plans for the Dodger Stadium parking lot, but even as described in the Project Description.

Response P140-30 Refer to Responses P140-25 through P140-27 for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P140-31 As stated above, the analysis of the Project's operational air quality impacts in Section 3.3, Air Quality, uses for its mobile source baseline information the 2019 "vehicular emissions associated with games and special events associated with Dodger Stadium resulting from passengers and vehicles traveling to the game along with employees" (p. 3.3-22; see also 3.3-16). Similarly, the greenhouse gas ("GHG") emissions reduction analysis in Section 3.8, Greenhouse Gas Emissions, also focuses exclusively on Dodger Stadium (pp. 3.8-17 - 3.8-18). The technical reports supporting both sections clearly state that the operations scenarios assume, for mobile source emissions:

> "the availability and use of the gondola system would decrease the number of people traveling to Dodger Stadium (and surrounding areas) in passenger vehicles and increase the number of people using transit. This shift in transportation mode would reduce total VMT and vehicle idling time in and around Dodger Stadium, associated with passenger vehicles."

Response P140-31 Refer to Response P140-13 for a discussion of how due to the COVID-19 pandemic, the 2019 Major League Baseball season was the most recent season at the time of the Notice of Preparation for the Draft EIR with fans in attendance, and while the Draft EIR was under preparation that included a full season of games at Dodger Stadium. Therefore, as noted, in Section 3.17, Transportation of the Draft EIR, data regarding game attendance from the 2019 season with fans in attendance was used

in the estimation of VMT. As also discussed in Response P140--13, the proposed Project would generate neighborhood ridership that would reduce vehicle miles traveled (VMT), but to provide a more conservative analysis, only the VMT benefits of the proposed Project were calculated on Dodger Stadium game/event days. (Appendix D, Air Quality/Health Risk Assessment, p. 23; Appendix J, GHG, p. 25.)

Comment P140-32 The GHG Section uses the same 2019 mobile source baseline information from Dodger Stadium and future mobile source estimates that the Air Quality Section used. (See Section 3.8, p. 3.8-x; Appendix D, AQ-J, p. 25.)

Response P140-32 Refer to Responses P140-13 and P140-31 for a discussion of the mobile source baseline and estimates.

Comment P140-33 The Air Quality section is further deficient by failing to set forth basic construction assumptions upon which its construction emissions calculations were based, including for example, whether all construction equipment was assumed to be operating simultaneously. To the extent that basic information, which is disclosed in virtually every Draft EIR Air Quality section when discussing construction emissions, may be included in Appendix B, Construction Assumptions, it is buried not only in that appendix, but in that appendix's many tables. An EIR that buries basic information such as construction impact assumptions in appendices does not suffice under CEQA as an informational document. (Santa Clarita Organization for Planning the Environment v. County of Los Angeles, supra, 106 Cal.App.4th at pp. 722-23; see also Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova (2007) 40 Cal.4th 412, 442 ("[I]nformation 'scattered here and there in EIR appendices,' or a report 'buried in an appendix,' is not a substitute for 'a good faith reasoned analysis.'").

Response P140-33 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR for a discussion of how the Draft EIR analyzed the proposed Project's potential air quality impacts consistent with guidance from the SCAQMD and the model recommended by SCAQMD and the California Air Pollution Control Officers Association, CalEEMod. The analysis demonstrates that the proposed Project would not cause an exceedance of any SCAQMD significance thresholds during construction or operations. As shown in Table 3.3-5, Maximum Mass Daily Emissions Due to Operation of the Project, of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions. As an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies (see Section 3.8.4, Environmental Impacts, of the Draft EIR's greenhouse gas emissions analysis and Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions Technical Report, for additional discussion).

The comment is mistaken about the Draft EIR's description of the construction assumptions upon which the calculations were based. Refer to Section 3.3.3, Methodology, of the Draft EIR's air quality analysis for the construction analysis' methodology. The methodology describes the assumptions upon which the construction analysis was based. This methodology section also describes the models which were used to prepare the emissions inventory for construction of the proposed Project and what the proposed Project construction health risk assessment evaluates. In addition, the thresholds that were utilized to assess significance for air quality are outlined in Section 3.3.3. The Draft EIR also cross-referenced the relevant technical appendices where additional information could be found, including Appendix B, Construction Assumptions, which summarizes the key assumptions informing the proposed Project's construction emissions calculations. Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR presents detailed information about the construction equipment (number of pieces of equipment, hours/day of use, horsepower, and load factor) in Table 4-2a and Table 4-2b by construction phase. The timing of these construction phases is presented in the construction schedule within Table 4-1 immediately preceding the equipment tables in this appendix. The Draft EIR summarized the more detailed technical information in the appendices about construction emissions.

The proposed Project construction analysis does not assume that all construction equipment is operating simultaneously because the analysis is designed to reflect the anticipated pace of construction, which would not involve all construction equipment operating simultaneously. In Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, Table 4-1 summarizes each construction activity's estimated duration and dates of activity. Daily emissions of each criteria air pollutant are provided in Table C.1-1 through Table C.2-4 in Appendix D of the Draft EIR, and each table is meant to capture emissions from overlapping activities through the total emissions provided at the end of each table.

The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. Such documents were clearly organized and did not require the public to sift or hunt for such information. Contrary to the comment about "burying" information in the technical reports, the Draft EIR appropriately summarized the proposed Project's potential impacts to construction emissions and cross-referenced more-detailed technical reports where additional information was available. In this way, the Draft EIR balanced the need to provide the public and decision makers the information that they need to meaningfully consider the full range of the proposed

Project's potential environmental impacts while considering CEQA's desire for clarity and brevity.

Comment P140-34 Likewise, analysis critical to the GHG Section is missing and/or improperly buried in the appendix. Specifically, the GHG section fails to provide an analysis related to a purported net decrease in GHG emissions, which is only discussed in the Appendix. The GHG Section also lacks analysis as to how the Project would purportedly decrease the number of people traveling to Dodger Stadium or the general area in passenger vehicles. Moreover, the reports buried within the appendix rely on unsupported assumptions, including, but not limited to, conclusions related to the reduction of emissions and trips, flawed data related to ticket sales, and outdated data from 2011 to 2015 related to ridership.

Response P140-34 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The Draft EIR analyzed the proposed Project's potential impacts from greenhouse gas (GHG) emissions consistent with guidance from the SCAQMD and the model recommended by SCAQMD and the California Air Pollution Control Officers Association, CalEEMod®. The Draft EIR includes a methodology section that describes the assumptions underlying the GHG analysis with appropriate cross-references to the applicable technical appendices. The Draft EIR summarized the more detailed technical information in the appendices about GHG emissions.

The Draft EIR analyzed GHG emissions based on a methodology and data described in the Draft EIR, with appropriate cross-references to the technical appendices. Contrary to this comment's suggestion, Section 3.8.4, Environmental Impacts, of the Draft EIR clearly describes the GHG impact analysis that was conducted on page 3.8-1 through page 3.8-19 of the Draft EIR. Section 3.08, Greenhouse Gas Emissions, of the Draft EIR concludes that the proposed Project would have a less than significant impact on GHG emissions. As described on page 3.8-18, the proposed Project would result in a net decrease in GHG emissions. As described on page 3.8-18, the proposed Project, as an innovative transportation project that would reduce VMT over time, results in a net reduction of GHG emissions, and helps advance local and state climate policies (refer to Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions technical report, of the Draft EIR for additional discussion).

Refer to Response P140-33 for a discussion of how appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. The Draft EIR properly includes an appendix that includes the details and substantial

evidence to support the analysis described in the Draft EIR, which includes Appendix J, Greenhouse Gas Emissions, and Appendix N, Transportation Appendices. Appendix N specifically addresses the proposed Project's VMT analysis regarding the reduction of trips and why data from 2011 to 2015 was used, on pages 13 and 28. The comment has not indicated why the Draft EIR's data and analysis related to ticket sales is flawed, and thus no further response is warranted. Nevertheless, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. This data was prepared by Metro in reports to the SCAQMD for the 2011-2015 Dodger seasons and was the most recently available at the time the analysis was conducted. Section 3.8.4 addresses the reduction in GHG emissions. The reduction in GHG emissions is described on pages 3.8-16 to 3.8-19 of the Draft EIR and further expanded upon in Appendix J, on pages 43 and 66. In Section 3.8.4, Environmental Impacts, of the Draft EIR, the summary of the GHG emissions for the proposed Project is presented in Table 3.8-1 and following this table, the contributing sources included in the GHG emissions inventory are described. Discussion regarding proposed Project consistency with applicable GHG reduction plans, policies, and regulations is also highlighted in this section. Refer to Response P140-33 for a discussion of how the Draft EIR appropriately summarized the proposed Project's potential impacts to GHG emissions and cross-referenced more-detailed technical reports where additional information was available. The Draft EIR provided substantial evidence for the determinations made for the proposed Project, while retaining more technical information in cross-referenced appendices to avoid making the Draft EIR sections too lengthy and technical for the average person who may review the Draft EIR.

Comment P140-35 IV. <u>THE DRAFT EIR IMPROPERLY FAILS TO IDENTIFY AND ANALYZE IMPACTS TO HISTORIC/ARCHAEOLOGICAL RESOURCES WITHIN ITS PURPORTED ANALYSIS OF IMPACTS TO CULTURAL RESOURCES</u>

CEQA requires a lead agency to evaluate whether a project would result in substantial adverse impacts affecting the significance of historical resources. (CEQA § 21084.1; CEQA Guidelines § 15064.5(a) and (b).) These resources include resources eligible for listing in the California Register of Historical Resources, and those listed in local historic resource registers. See Citizens for Responsible Development in West Hollywood v. City of West Hollywood, 39 Cal.App.4th 490, 503-504 (1995). Additionally, special standards apply under CEQA regarding the mitigation of impacts to historic resources. (See, e.g., Pub. Res. Code § 21084.1; CEQA Guidelines §§ 15064.5, 15126.4; Citizens for Responsible Development in West Hollywood, supra, 39 Cal.App.4th at 500-501.)

Response P140-35 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not address an environmental issue or raise a substantive issue on the content of the Draft EIR. This comment is noted and will be

provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-36 Regarding the construction of the proposed Chinatown Station, the Draft EIR ignores the fact that remnants of the Zanja Madre have been found in many areas near the area of direct impacts depicted in Figure 3.5-2. These finds have been documented in studies now public that attached to EIRs prepared for nearby developments. (See, e.g., Exhibit 4, Appendix L to the Draft EIR for the College Station project, esp. the discussions of the Zanja Madre at pp. 12-16, 30-31.) The Draft EIR acknowledges that the Zanja Madre is a unique archeological resource (see CEQA Section 21083.2) in its discussion of the Zanja Madre in connection with the proposed Alameda Station. (Section 3.5, Cultural Resources, p. 3.5-37.) Even so, the Draft EIR fails to acknowledge the likelihood that remnants of the Zanja Madre may be encountered.

Response P140-36 This response takes into consideration the comment's referenced Exhibit 4. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation, including both the Zanja Madre and archaeological resources in the vicinity of the proposed Project's Alameda Station and archaeological resources in the vicinity of the proposed Project's Chinatown/State Park Station.

Table 3 within Appendix F notes that six resources with at least one segment of the Zanja Madre were recorded within 1/8-mile of the project (P-19-000007, P-19-000887, P-19-003103, P-19-004196, P-19-004741, P-19-190309).

Only one resource, P-19-000887, is located within an area of direct impact. As noted on page 3.5-58 of the Draft EIR, P-19-000887 includes a segment of the Zanja Madre recorded within 500 square feet of the area of direct impacts of the proposed Alameda Station where the proposed vertical circulation elements would be located on an area currently containing a parking and loading area for El Pueblo. As noted on page 3.5-58, there is no overlap between the known locations of the Zanja Madre within El Pueblo and the proposed ground disturbance for the proposed Alameda Station. This segment of the Zanja Madre was capped in 1978 for preservation, is currently denoted by decorative pavement, and will not be impacted by the proposed Project. As noted on pages 3.5--58 and -59 of the Draft EIR, the proposed Project has potential to significantly impact buried, unrecorded material in other portions of P-19-000887 and, as such, mitigation measures related to archaeological testing and recovery have been proposed that will reduce impacts to the resource to less than

significant. Specifically, Mitigation Measure CUL-C notes that although the proposed Project is designed to not impact the portion of the Zanja Madre within Resource 19-000887, but nevertheless requires a testing plan to be prepared for portions of the site that will be impacted outside of the known Zanja location.

All other resources containing segments of the Zanja Madre are located outside of the area of direct impacts. Resource P-19-190309 consists of the 70-foot-long segment of the brick Zanja Madre conduit that is currently exposed and located northwest of Los Angeles State Historic Park near the intersection of North Broadway and Bishops Road. The Draft EIR provides an overview of P-19-190309. P-19-19039's setting has been substantially altered from its historic state, and the resource, which is meant to be buried, is now exposed. A nomination for this portion of the Zanja Madre for NRHP inclusion is considered withdrawn. Refer to pages 42, 52, and 91-92 of Appendix F of the Draft EIR for further information about P-19-190309.

As stated on page 3.5-68, in Section 3.05, Cultural Resources, of the Draft EIR, the proposed Project includes Mitigation Measure CUL-A, Cultural Resources Monitoring and Mitigation Plan, which requires a Cultural Resources Monitoring and Mitigation Plan (CRMMP) be prepared by a qualified archaeologist prior to project construction. Additionally, Mitigation Measure CUL-A requires the CRMMP be applicable to all ground disturbance extending into native soil with known archaeological sites and other areas of high sensitivity, and accounts for the unanticipated encounter of previously unknown and undocumented archaeological resources, requiring protocols for such an event. Mitigation Measure CUL-A also would incorporate specific requirements related to the Chinatown/State Park Station, requiring monitoring for ground-disturbance activities up to approximately 15 feet in depth at the Chinatown/State Park Station. The requirements include SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when feasible. As further discussed in Mitigation Measure CUL-A, the General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." The CMMP is applicable for all ground-disturbance activities extending into native soil within known archaeological sites and other areas of high sensitivity. Accordingly, while there are no known segments of the Zanja Madre within the area of direct impacts at the Chinatown/State Park Station, the proposed Project provides mitigation in the event of an unanticipated discovery.

Comment P140-37 The Draft EIR's failure to acknowledge the possibility of encountering these CEQA-defined unique archeological resources and to assess the Project's potential impacts on them, and as discussed below, to mitigate any potentially significant impacts on

these resources properly as CEQA requires constitute clear violations of CEQA and yet another defect in the Draft EIR.

Response P140-37 Refer to Response P140-36 for a discussion of how all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. The Draft EIR evaluates all known, previously recorded archaeological resources in the Area of Potential Impact (API), as well as the potential to inadvertently encounter previously unknown and undocumented archaeological resources. As stated on page 3.5-68, in Section 3.05, Cultural Resources, of the Draft EIR, the proposed Project includes Mitigation Measure CUL-A, Cultural Resources Monitoring and Mitigation Plan, which requires a Cultural Resources Monitoring and Mitigation Plan (CRMMP) be prepared by a qualified archaeologist prior to project construction. Additionally, Mitigation Measure CUL-A requires the CRMMP be applicable to all ground disturbance extending into native soil with known archaeological sites and other areas of high sensitivity, and accounts for the unanticipated encounter of previously unknown and undocumented archaeological resources, requiring protocols for such an event. Mitigation Measure CUL-A also would incorporate specific requirements related to the Chinatown/State Park Station, requiring monitoring for ground-disturbance activities up to approximately 15 feet in depth at the Chinatown/State Park Station. As stated on page 3.5-69, in Section 3.05, Mitigation Measure CUL-B, Archaeological Resources Worker Training Program, would provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources in order to mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, including with input from the Los Angeles State Historic Park staff for construction at the Chinatown/State Park Station. Further, page 3.5-70, in Section 3.05 details Mitigation Measure CUL-C through CUL-F, which would mitigate the potential impacts to specific, known archaeological resources. Specifically, Mitigation Measure CUL-E provides for an archaeological testing plan for the Los Angeles State Historic Park. As concluded on page 3.5-71, in Section 3.05 of the Draft EIR, with implementation of Mitigation Measures CUL-A through CUL-F, the potentially significant impacts related to archaeological resources would be reduced to less than significant levels.

Comment P140-38 V. <u>THE DRAFT EIR'S NOISE ANALYSES ARE INCOMPLETE</u>

As discussed above, the Draft EIR's Noise Section fails to assess the Project's potential operational noise impacts resulting from the gondolas passing close by occupied buildings, particularly sensitive uses. That the gondolas will pass close by such uses is tacitly acknowledged by the fact that the gondolas will ostensibly be fitted with glass that can become opaque when the gondolas pass by "sensitive views," which are not defined. (Section 2.0, Project Description, p. 2-18.) As stated above, the gondolas will pass particularly close to the windows of the Property's multifamily units as frequently as every 23 seconds on game days. Yet, the Draft EIR provides no

information regarding the noise levels that would be generated by one gondola running so close to the Property's windows, much less an unbroken line of gondolas every 23 seconds. The potential noise impacts the gondolas would create as a continuous source of noise are not analyzed.

Response P140-38 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. Operational noise would be expected from the equipment and mechanical operations of the stations, junction, and towers, as well as noise from cabins and passengers waiting to board in stations. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. To provide a conservative operational noise analysis, the worst-case scenario was selected which represents a Dodger Game Day, with the highest line speed, cabins per hour, and queuing numbers, and with nighttime operations. Tables 3.13-22, 3.13-23, and 3.13--24 on pages 3.13-53 to 3.13-57 of Section 3.13, Noise, of the Draft EIR demonstrate that operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, FTA, and LAMC. In addition to the primary operational noise levels evaluated in the Draft EIR, the noise generated inside cabins was also evaluated separately, as demonstrated on Table 3.13-25 on page 3.13-57 of the Draft EIR. Cabin noise might be expected from the people traveling inside the cabin and any heating, ventilation, and air conditioning (HVAC) equipment associated with the cabin. The proposed Project would implement project design feature NOI-PDF-A in Section 3.13.6 that provides specifications regarding the interior-to-exterior noise reduction of the gondola cabins as well as the sound power level of the HVAC system. As shown in Table 3.13-25, with implementation of project design feature NOI-PDF-A, noise from the gondola cabins would be at least 10 dBA less than the existing nighttime noise level at noise-sensitive uses. Because the gondola noise would be at least 10 dBA less than the existing nighttime noise level, cabin noise will not contribute to the overall operational noise levels at any NSRs. Refer to Responses GO17-128 and Response GO17-129 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment P140-39 The cumulative operational noise impact analysis is also incomplete. At pages 5-33 and 5-34 of Section 5.2, Cumulative Impacts, the Draft EIR acknowledges that related projects include, inter alia, transportation projects, but fails to identify or assess the noise generated by any transportation project.

Response P140-39 As noted in Section 5.0, Other CEQA Considerations, of the Draft EIR, on page 5-30, the geographic context for the cumulative impact analysis for noise and vibration is the vicinity of the proposed Project alignment and construction haul routes. Draft EIR Table 5-1 shows that the cumulative related projects are primarily residential, restaurant, retail, hotel, and office. The transportation projects referenced on Draft

EIR page 5-33 and included in Table 5-1 are mostly around LAUS. The remaining transportation projects referenced on page 5-33 and included in Table 5-1 would not interact with proposed Project operational noise due to distance attenuation. Vehicle noise from related project operations is accounted for in the projected traffic volumes and discussed on page 5-34. The proposed Project's operational cumulative noise impacts are shown to be less than significant.

Comment P140-40 An obvious related transportation project that would contribute to cumulative noise levels along with the Project is the Gold Line's Chinatown Station, which is located adjacent to the Project's planned Chinatown Station. Particularly on game days, the noise generated by passengers of the Gold Line's Chinatown Station could well substantially contribute to the cumulative noise levels in the area, and should have been added to the cumulative noise levels assessed.

Response P140-40 Refer to Section 5.0, Other CEQA Considerations, for discussion of related projects and cumulative impacts analysis for the proposed Project. The list of related projects for the proposed Project includes transit-related projects that are anticipated to be constructed during the same timeframe as the proposed Project (2024-2026); and operational at the same time as the proposed Project (opening year 2026 and Horizon Year 2042). Under CEQA, projects that already exist at the time the NOP is prepared are considered to be part of the existing physical conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines § 15125(a)) and are not considered related projects, and thus not included in the list of past, present, and probable future projects producing related or cumulative impacts in Table 5-1: Related Projects, on page 5-3 of Section 5.0, Other CEQA Considerations, of the Draft EIR. (CEQA Guidelines § 15130(b)(1)(A).) As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, the Metro L Line (Gold) Chinatown Station is an existing Metro light rail station and the related noise levels are captured in the baseline noise measurements (see Draft EIR, Section 3.13.3.1, Figure 3.13-4, and Table 3.13-9). Specifically, measurement locations ML-07 through ML-14 are in the vicinity of the Metro L Line (Gold) Chinatown Station and captured the station's contribution to the noise environment. The noise from proposed Project operations compared to existing measured ambient conditions (which includes noise from the Metro L Line (Gold) Chinatown Station) are evaluated in the operational noise analysis in Section 3.13.15.2 of the Draft EIR.

Comment P140-41 VI. <u>THE DRAFT EIR'S TRANSPORTATION ANALYSIS IS FLAWED</u>

As discussed above, the Draft EIR's Transportation Section relies on speculation to inflate the Project's projected ridership numbers. The Project cannot justify its 18-hour schedule and Chinatown Station when a substantial number of the future riders are assumed to be tourists based on projections that are abstruse and ultimately speculative. Further, as discussed above, the neighborhood ridership numbers are also speculative, whether or not they were validly projected, since the Project does not contain a mobility hub at the Dodger Stadium station on which the

currently unserved neighborhoods would depend. Moreover, even if the tourism-generated ridership numbers were valid, those riders are expected to travel to the Dodger Stadium station, only, which assumption again demonstrates that the Project has only a single purpose – the development of a gondola between Union Station and Dodger Stadium to eliminate vehicle trips to Dodger Stadium.

Response P140-41 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Accordingly, the need for the proposed Project is well established. Refer to Response P140-19 for discussion of how in order for the proposed Project to provide effective public transit in particular for commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, Echo Park, and Solano Canyon, the proposed Project needs to provide a sufficient span of service similar to the rail and bus transit serving LAUS.

Refer to Responses P140-13, P140-14, P140-19, P140-20, and P140-21 for a discussion of proposed Project need, ability to reduce greenhouse gas emissions and improve air quality, and ridership and ridership assumptions. The Draft EIR's transportation impact analysis is defensible and conservative in its quantification of the vehicle miles traveled reduction benefits. The ridership estimates are based on the best available data, which are documented in detail in Section 3.17, Transportation and Appendix N, Transportation Appendices, of the EIR. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17,

Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[6] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P140-42 Similar to other sections of the Draft EIR, the Transportation Section relies on reports and models that are either impermissibly buried within or only referenced without being included in the appendix.

Response P140-42 The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. Models related to the Transportation analysis, provided in Section 3.17, Transportation, of the Draft EIR, are available in Appendix N, Transportation Appendices, of the Draft EIR. Other models referenced are provided in reference to the Downtown Community Plan Update/New Zoning Code for Downtown Community Plan Draft Environmental Impact Report on Page 3.17-24, in Section 3.17,. A website URL to this document is provided in Footnote 8 of Section 3.17, Transportation.

Comment P140-43 VII. <u>THE DRAFT EIR'S FAILS TO ASSESS OTHER CRITICAL PROJECT EFFECTS</u>

As discussed above, the Project Description states that the gondola cabins would be fitted with privacy glass that can become opaque while adjacent to sensitive views." (Section 2.0, Project Description, p. 2-18.) "Privacy glass" and "sensitive views" are not defined and nothing further is said. However, this statement tacitly acknowledges that the Project would significantly adversely affect sensitive land uses and receptors – including the future residents of the Property. It is also disclosed that, on game days, the gondolas would run every 23 seconds. (Id.)

The need to fit the gondolas with "privacy glass" to protect "sensitive views" is a tacitly acknowledgment that otherwise the Project would significantly adversely affect sensitive land uses and receptors – including the future residents of the Property.

Response P140-43 As stated on page ES-17, in the Executive Summary, of the Draft EIR, the proposed Project would not result in any significant and unavoidable operational impacts. Refer to Response P140-17 for a discussion of "privacy glass" and "sensitive views."

[6] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Comment P140-44 Other information not readily available in the Draft EIR explains why. Although the information is buried in Appendix M, Noise and Vibration Report, the Draft EIR "discloses" that the gondolas would run just 35 feet from the windows of the Property's residents. Gondolas filled with up to 40 persons running by the windows of the Property's residents every 23 seconds on "game days" would create a significant environmental impact on those residents (as well as an invasion of privacy) that is not analyzed in the Draft EIR. (See id., p. 2-18.) This impact is not assessed in the Draft EIR.

Response P140-44 Refer to Response P140-17 for a discussion of the Draft EIR's operational analysis related to nearby residences, and disclosure in the Project Description of the proposed Project's proximity to the approved College Station development. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. As noted on page 3.13-57 of the Draft EIR, an analysis was conducted to evaluate the noise from the gondola cabins as they travel between the stations, towers, and junction in proximity to receptor locations. Cabin noise might be expected from the people traveling inside the cabin and any heating, ventilation, and air conditioning (HVAC) equipment associated with the cabin. The proposed Project would implement project design feature NOI-PDF-A that provides specifications regarding the interior-to-exterior noise reduction of the gondola cabins as well as the sound power level of the HVAC system. Refer to Response GO17-127 for analysis of operational noise impacts associated with sleep disturbance, which includes an analysis that uses the Sound Exposure Level (SEL) acoustics metric. As identified therein, operational noise impacts associated with sleep disturbance would be less than significant. Privacy is not a CEQA issue, accordingly, no further response is warranted. Refer to Response P140-17 for a discussion of "sensitive views" and "privacy glass." The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Appendices were appropriately used in the Draft EIR to provide to the public with underlying documents that supported the analysis and findings in the Draft EIR, should they wish to read further on the particular subject, while still balancing CEQA's desire for clarity and brevity. Such documents were clearly organized and did not require the public to sift or hunt for such information.

Comment P140-45 The Draft EIR attempts to pass any such impact as an aesthetic impact, as a potential effect on a private view that CEQA does not recognize. (Section 3.1, Aesthetics, p. 3.1-13.) However, there can be no argument that gondolas running every 23 seconds just 35 feet from a residential window for hours 100 days per year, and at longer intervals daily from 6:00 a.m. to 12:00 a.m. is a serious impact on the environment that must be assessed. As the preface to Appendix G states, Appendix G

"is a sample form that may be tailored to satisfy individual agencies' needs and project circumstances. … Substantial evidence of potential impacts that are not listed on this form must also be considered."

Response P140-45 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Because visual impacts under the L.A. CEQA Thresholds Guide are assessed based on changes to public views, description of resident viewer groups was provided only for informational purposes as private views from residential properties are not protected under the L.A. CEQA Thresholds Guide. This description of resident viewer groups for informational purposes only was provided with the understanding that, even within different viewer groups, visitors and residents likely hold unique values regarding the significance of views, and the significance of an impact is not based solely on a project's visibility from public viewpoints. In the evaluation of aesthetics, the Draft EIR analysis considers a range of qualifying factors consistent with methods and guidance provided by the Federal Highway Administration (FHWA) for evaluating visual impacts, as well as the CEQA Guidelines and City of Los Angeles CEQA thresholds. Accordingly, the Draft EIR's aesthetics analysis more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Response P140-17 for a discussion of operational analysis related to nearby residences. The impacts to the multifamily residential building referenced by this commenter were addressed throughout the Draft EIR. As discussed in Sections 3.01, Aesthetics, 3.03, Air Quality, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to the multifamily residential building referenced by this commenter. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment P140-46 Further, Section 5.5, Other Additional Evaluations, of the Draft EIR contains an assessment of the Project's potential impact on kite flying, an impact not customarily recognized under CEQA, and on the use of the Los Angeles State Historic Park for special events and for routine activities such as personal reflection. (Section p. 5-60 – 5.63.) The Project's effect on a multifamily residential building would be experienced over an 18-hour period every day, and would be a more serious and intrusive effect

than that experienced by recreational users of the Park that must be analyzed in the EIR.

Response P140-46 Refer to Section 5.5.1, Kites, of Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of kites in response to a comment in response to the NOP identifying flying kites in the Los Angeles State Historic part as a known recreational activity of park users. The impacts to the multifamily residential building referenced by this commenter were addressed throughout the Draft EIR. As discussed in Sections 3.01, Aesthetics, 3.03, Air Quality, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to the multifamily residential building referenced by this commenter. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P140-47 VIII. <u>THE DRAFT EIR'S MITIGATION MEASURES ARE INVALID UNDER CEQA</u>

An EIR must identify feasible mitigation measures "which could minimize significant impacts" of the project. (CEQA Guidelines § 15126.4(a)(1).) Improper deferral of feasible mitigation occurs where an agency defers the formulation of mitigation measures to some future time, concluding based on "loose or open ended" measures that impacts can be reduced to a less than significant level. (Rialto Citizens for Responsible Growth v. City of Rialto (2012) 208 Cal.App.4th 899, 945.) Reliance on

unspecified programs and practices as mitigation to be adopted in the future without any mandatory commitments or performance standards is insufficient under CEQA. (See Endangered Habitats League v. County of Orange (2005) 131 Cal.App.4th 777, 793-794.)

Response P140-47 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations, but does not address an environmental issue or raise a substantive issue on the content of the Draft EIR. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P140-48 As stated above, the Draft EIR fails to describe key elements of the Project and omits technical data in a manner that frustrates any valid impacts analysis of the Project as described in Section 2.0, Project Description, in addition to impacts from omitted components of the Project such as the future redevelopment of the areas on and surrounding the Dodger Stadium parking lot with commercial uses, which, in conjunction with the Project, could have additional and/or cumulative and/or growth-inducing environmental impacts. The Draft EIR's failure to assess the significance of such impacts eliminates its ability to determine whether the mitigation measures it identifies would in fact reduce the Project's potentially significant impacts below applicable thresholds of significance.

Response P140-48 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Responses P140-25 through P140-29 for further discussion of how the Draft EIR analyzed all reasonably foreseeable impacts of the proposed Project.

Comment P140-49 Furthermore, as set forth above, certain of the mitigation measures identified in the Draft EIR are legally invalid either because they violate CEQA's standards for the particular type of mitigation, or because they lack substance or rely on unspecified and unformulated future measures, practices and plans that provide no substantial evidence supporting the Draft EIR's assertion that they would actually reduce potentially significant impacts to less than significant levels. (See Endangered Habitats League, supra, 131 Cal.App.4th at pp. 793-794; Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 309.)

Response P140-49 This comment provides a general summary of comments raised in this letter. Responses to the comments contained in this letter are provided in Responses P140-1 through P140-48, and below in Responses P140-50 through P140-55. Refer to Topical

Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA.

Comment P140-50 For example, Mitigation Measure CUL-A, addressed to unexpected archeological finds, violates the terms of CEQA Guidelines Section 15126.4(b)(3) and improperly defers mitigation. (Section 3.5, Cultural Resources, pp. 3.5-68-3.5-69.) It calls only for the preparation of an as-yet unformulated "Cultural Resources Monitoring and Mitigation Plan" ("CRMMP") that is merely generally and insufficiently described. Among the major defects in the future CRMMP is that it violates CEQA Guidelines Section 15126.4, subsection (b)(3). That subsection mandates that certain factors "shall be considered and discussed in an EIR for a project involving such an archaeological site." The first such factor, listed at Section 15126.4, subsections (b)(3)(A) and (B), states that preservation in place is the preferred manner of mitigating impacts and may be accomplished by at least four means. The future CRMMP breezes by preservation in place: treatment may involve data recovery or preservation in place. (Section 3.5, Cultural Resources, p. 3.5-69.) The Draft EIR neither considers nor discusses any alternatives for preservation in place of any unexpected archeological finds. Yet, such finds are highly likely along the Project's alignment, given the long history of settlement in the area and the numerous built historic resources near and surrounding the proposed Alameda Station. Moreover, preservation in place for archeological finds near El Pueblo, for example, may be the only mitigation measure that would truly reduce the Project's impacts to less than significant, since an unexpected find in that area may well be associated with a larger as-yet undiscovered cohesive archeological find such as the remains of a village, home, or other structure.

Response P140-50 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to archaeological resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project. As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. The Draft EIR evaluates all known, previously recorded archaeological resources in the Area of Potential Impact (API), as well as the potential to inadvertently encounter previously unknown and undocumented archaeological resources. Refer to Responses P140-36 and P140--37 regarding the adequacy of the Draft EIR assessment of archeological resources and an overview of the Draft EIR's mitigation measures related to cultural resources. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review (for example, where ground disturbance and excavation is infeasible prior to project approval). Refer to

Responses P140-51 and P140-52 for additional discussion of why additional study regarding archaeological resources is not appropriate prior to project approval. As provided in Mitigation Measure CUL-A, on page 3.5-69 of the Draft EIR, the CRMMP will lay out regulatory requirements which will be adhered to, including SHPO consultation and practices that seek to avoid and preserve state--owned historical resources. In addition, the "Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Treatment may include implementation of archaeological data recovery excavations to remove the resource or preservation in place." Accordingly, the best possible treatment for the resource will be determined based upon Public Resources Code requirements in consultation with a qualified archaeologist. CEQA itself recognizes that while preservation in place is the preferred method of mitigating impacts, other approaches may still reduce potential impacts to less than significant if preservation in place is not feasible. For instance, CEQA Guidelines Section 15126.4(b)(3) acknowledges that data recovery through excavation may be the only feasible mitigation, and that a data recovery plan, which provides for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Refer to Section 5.0, Corrections and Additions, of the Final EIR for a discussion of how Mitigation Measures CUL-A, CUL-C, and CUL-D have been revised consistent with CEQA Guidelines section 15126.4(b)'s recognition that "preservation in place is the preferred manner of mitigating impacts to archaeological sites," and that data recovery plans may be prepared "[w]hen data recovery through excavation is the only feasible mitigation."

Comment P140-51 Mitigation Measure CUL-A and its CRMMP also violate CEQA by deferring to the future the details of the measures that would actually mitigate the impacts. No information is provided as to when preservation in place would be required over recovery, or vice versa; in fact, again, it appears that recovery is the preferred measure. (See Section 3.5, Cultural Resources, p. 3.5-69, 3.5-57; see also, 3.5-61.) They also violate CEQA by allowing Metro, a non-expert, to determine whether a discovered resource is potentially eligible for the California Register of Historic Resources or may potentially qualify as a unique archeological resource under CEQA. (Section 3.5, Cultural Resources, p. 3.5-69.)

Response P140-51 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for a discussion of how CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be

appropriately tailored to the potential impact. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to archaeological resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project. Refer to Responses P140-36 and P140-37, above, regarding the adequacy of the Draft EIR assessment of archeological resources, and Response P140--50, above, regarding the nature and adequacy of Mitigation Measure CUL-A. Refer to California Code of Regulations 15064.5 regarding the process by which a Lead Agency may determine significance of a resource and its eligibility for potential listing in the California Register of Historical Resources (CRHR).

Comment P140-52 Mitigation Measures CUL-C, CUL-D and CUL-E suffer from the same defects as does Mitigation Measure CUL-A, but are even more focused on data recovery as the only mitigation solution, without any consideration or discussion of preservation in place, even though the Draft EIR recognizes the archeological sensitivity of the area. (Section 3.5, Cultural Resources, p. 3.5-70.) These measures also improperly defer mitigation and are impermissibly vague by providing that "criteria thresholds that would require data recovery" (p. 3.5-70), an undisclosed "data recovery plan shall be implemented" (id.)

Response P140-52 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to archaeological resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project. Refer to Responses P140-36 and P140-37, above, regarding the adequacy of the Draft EIR assessment of archeological resources and Mitigation Measures CUL-C through CUL-E. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review (for example, where ground disturbance and excavation is infeasible prior to project approval). With respect to Mitigation Measures CUL-A and CUL-C through CUL-E, as acknowledged on page 3.5-2, Section 3.05, Cultural Resources, of the Draft EIR, "an archaeological resource may not be recognizable or even observable without ground-disturbing activities." Mitigation Measures CUL-A and CUL-C through CUL-E accordingly outline actions that would be taken in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture. Mitigation Measure CUL-C requires that if avoidance is not feasible, a testing and data recovery plan shall be prepared outlining the procedures for potential discovery, including the criteria thresholds for requiring data recovery following testing, and how data recovery shall describe the specific methods to be used for excavation, mapping, and data recovery. Similar requirements are provided in Mitigation Measures CUL-D and CUL-E. Refer to

Response P140-49 for a discussion of how CEQA provides that data recovery through excavation may be the only feasible mitigation and would reduce potential impacts to less than significant if preservation in place is infeasible. Consistent with the requirements of CEQA Guidelines section15126.4(b)(3), Mitigation Measures CUL-A and CUL-C recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites, but may not be feasible, allowing for data recovery in such circumstances. Similarly, Mitigation Measure CUL-E recognizes that if "avoidance/preservation-in-place is not possible," a data recovery plan should be implemented. Refer to Section 5.0, Corrections and Additions, to the Final EIR, for a discussion of how Mitigation Measures CUL-A, CUL-C, and CUL-D have been revised consistent with CEQA Guidelines section 15126.4(b)'s recognition that "preservation in place is the preferred manner of mitigating impacts to archaeological sites," and that data recovery plans may be prepared "[w]hen data recovery through excavation is the only feasible mitigation."

Comment P140-53 Given these defects in these mitigation measures, the Draft EIR contains no substantial evidence supporting its conclusion that impacts on archeological resources would be less than significant.

Response P140-53 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments contained in this letter are provided above in Responses P140-47 through P140-53. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to archaeological resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, prepared by experts Marc A. Beherec, Ph.D., R.P.A., and Christy Dolan, R.P.A., of AECOM. Appendix F provides substantial evidence to support the Draft EIR's conclusion that all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P140-54 IX. ALTERNATIVES

The Draft EIR improperly rejects Use Option D for failing to meet "a majority of the Project's objectives" because this Option would not include passenger facilities, but would only be a junction. (Section 6.5, Use Option D, p. 6-38.) These Project objectives, according to the Draft EIR, include enhancing community connectivity and providing accessible fare opportunities (a subject not addressed in the Draft EIR). (Id.) The discussion further explains that a junction in place of a station with passenger facilities would not provide transit options for the Chinatown and Mission Junction neighborhoods or for the Park.

Response P140-54 This comment provides a general recitation and characterization of Design Option B. Section 6.0, Design and Use Options, of the Draft EIR, includes discussion of Use Option D referenced by this commenter. Section 6.0 includes design and use options responsive to public comments and stakeholder feedback, and describes how

environmental impacts from implementation of each design and use option would differ from the proposed Project's potential environmental impacts described in Section 2.0, Project Description and analyzed in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, with respect to the particular project component variation. The design and use options provide flexibility for decision makers to potentially adopt one or more minor variations to components of the proposed Project should the decision maker determine such a minor variation is desirable as part of the proposed Project. The design and use options are not alternatives to the proposed Project, which are included in Section 4.0, Alternatives, of the Draft EIR. The Draft EIR does not "reject" or otherwise advance forward a particular design and use option. Therefore, the Draft EIR has not "rejected" Use Option D. Use Option D provides for the Chinatown/State Park Station to be a non--passenger junction, similar to the proposed Project's Broadway Junction, instead of the proposed Project's Chinatown/State Park Station which would function as a passenger station. As discussed in Section 2.0, Project Description, the proposed Project's Chinatown/State Park Station would be located near the southernmost entrance to the Los Angeles State Historic Park and would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold). This station would address the goal of creating a stronger connection with the Metro L Line (Gold) and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Use Option D would not provide this connection. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P140-55 However, as discussed above, the Gold Line’s Chinatown Station already serves these neighborhoods and is already just one mile from the Park. The Project really only serves Dodger Stadium and therefore a Station at Chinatown would not only be more impactful but also unnecessary. There is no question that a junction, rather than the larger station proposed, would have a lesser impact on the area, particularly since the Gold Line’s Chinatown Station already exists.

Response P140-55 Refer to Response P140-9 for discussion of the purpose and need for the proposed Project. Refer to Response P140-54 for discussion of why an intermediate station is

proposed for the Chinatown/ State Park Station instead of a junction. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. As detailed in the Draft EIR, the proposed Project's Chinatown/State Park Station would have less than significant operational impacts.

Comment P140-56 X. CONCLUSION

Based on the foregoing, the Draft EIR fails to suffice under CEQA as an informational document. It fails to assess critical impacts and fails to provide the requisite substantial evidence supporting its conclusions that the majority of the Project's impacts would be less than significant. To the contrary, as noted above there is ample evidence suggesting that the Project, both individually and cumulatively, would have significant effects on the environment that are not identified, assessed or mitigated in the Draft EIR. The Draft EIR must be revised and recirculated to address its fundamental defects before the Project can be considered for approval.

Very truly yours,

DLA PIPER LLP (US)
A. Catherine Norian
Enclosure (Exhibits 1-4)

Response P140-56 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P140-1 through P140-55. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment Letter P141 – Bill Haller

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P141

Comment P141-1 Dear Cory,

Hooray! Let's get this done!

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

Kind regards,

Bill Haller

Response P141-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P142 – Justin Carrus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P142

Comment P142-1 To whom it may concern,

I'm a 90012 resident and have been following this project for the past several months. I attended the event at Union Station and spent over an hour discussing the results of the EIR and project at large with the hosts. After some more research and reflection, I would like to voice some concerns for the project.

Response P142-1 This comment provides a general introduction regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P142-2 though P142-4.

Comment P142-2 My primary concern is simply about understanding how the project is financed. At the Union Station event I was told that the project will be entirely financed by an external benefactor who will only donate the funds for this project in particular (as opposed to sponsoring other projects). Furthermore that the benefactor would pay for ongoing maintenance and that the cost to users would be the same as the rest of the Metro system.

To me, this seems unlikely to be true (and if true, seems unlikely to work in reality unless there is some kind of endowment created for the ongoing financing of this project), and I'm unable to find confirmation in any legally binding way that this is the case. If you are able to provide authoritative information about this, please include it in your response.

Response P142-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P142-3 My second concern is about the choice of gondola over other alternatives. As far as I can tell, no other alternatives have been considered as this was an "unsolicited proposal". I feel as though the due-diligence for this project has not been done. It seems this project is a solution looking for a problem rather than an optimal plan. I am not able to support a project that assumes that the first solution considered is the best solution.

Response P142-3 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

The Draft EIR itself serves as a "feasibility study" for the proposed Project, with 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts.

Comment P142-4 My final concern is that the ART project doesn't address the largest issue with Dodger Stadium: that the venue itself is disconnected from the surrounding urban fabric by its own parking lots. Great urban ballparks (and venues) are connected to the surrounding neighborhoods in a way that allows patrons to arrive early, enjoy food and drink before the event, walk to the park, enjoy the event, and linger after. I would much prefer this project to omit the gondola (which seems very high-risk for the expected value of moving 5k pp/hr) and instead focus on improving the walkability of Vin Scully Ave. and creating connections to the park from Chinatown. Patrons already park in the surrounding area and walk to the park, so the distance is not too great. The Chinatown L Line stop is geographically very close to the park, and the LA Historic Park regularly hosts events with >10k attendees, even without the direct highway access that Dodger Stadium has. Transit options already exist to get to Chinatown and Echo Park from many places in the city and the last-mile improvements would be much more beneficial to the area than a gondola.

Response P142-4 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract

substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P142-5 I appreciate you taking the time to solicit and read these responses. If I am misinformed, please send any relevant information along.

Response P142-5 This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments contained in this letter are provided above in Responses P142-2 through P142-4.

Comment Letter P143 – Nidhi Mikhanj

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P143

Comment P143-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,
Nidhi Nikhanj, MD

Response P143-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P144 – Jasvinder Bawa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P144

Comment P144-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,
Jas

Response P144-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P145 – Ralph Levinson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P145

Comment P145-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

What a win-win! Jobs, fight pollution, save fans gas, and help climate change. And fun!

Sincerely,
Ralph Levinson, M.D.

Response P145-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P146 – Susan Levinson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P146

Comment P146-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,
Susan

Response P146-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P147 – Brenda Nuyen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P147

Comment P147-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,
Brenda Nuyen

Response P147-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P148 – Dylan Sittig

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P148

Comment P148-1 Hello Mr. Cory Zelmer,

I am writing to express my concern about the LAART project and the environmental impacts that it will have on the community and the City.

While the Environmental Impact Report (EIR) brings to light certain impacts of the project on the environment, the simple fact is that the negative impacts of this project go beyond the scope of an EIR and California Environmental Quality Act review (public funding, privacy concerns, etc.). The EIR lays out the potential for significant and unavoidable impacts and relies on questionable mitigation measures to attempt to address significant impacts.

Response P148-1 The Draft EIR analyzes the whole of this action, as well as reasonably foreseeable potential environmental impacts resulting from this action. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA.

Comment P148-2 There is no way that the undefined potential benefits of this program would possibly outweigh the clear and obvious negative environmental and societal impacts associated with the construction and operation of the Project. I urge you to halt this program as soon as possible.

Response P148-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high- capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los

Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P148-3 The Project is not community serving and does nothing to enhance mobility for existing Chinatown residents. Ample public transit service between Union Station and Chinatown already exists in the form of numerous Metro Buses, multiple DASH buses, the Gold / L Line, and it is a very short walk. In no instance will the non-game day head ways be more efficient than many of these other pre-existing transit options.

Response P148-3 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project supports Metro's goal of prioritizing equity opportunities and helps promote public transit as an essential lever in enabling access and improving quality of life for Los Angeles County. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P148-4 There will be negative impacts to the efforts to increase the Union Station Alameda forecourt. Having an obtrusive tram station will detract from the pedestrian realm and is antithetical to the type of street activation that is desired near Olvera Street and along Alameda Street.

Response P148-4 As discussed in Section 2.0, Project Description, of the Draft EIR, Metro's LAUS Forecourt and Esplanade Improvements Project is currently being developed in coordination with the City of Los Angeles, and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. In addition, the Project proposes a new pedestrian plaza north of the Placita de Dolores in an area currently used as a parking and loading area for El Pueblo. As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station location was selected in part because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access, and because the location is compatible with Metro's plans at LAUS, including the LAUS Forecourt and Esplanade Improvements Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder

groups, and how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P148-5 Additional exploration of the Transportation Systems Management Alternative should be further explored. The project objectives were too narrowly defined in a way that doesn't truly serve the needs of the people of the City of Los Angeles, or the residents of Chinatown.

Response P148-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The proposed Project's objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree." (CEQA Guidelines, §15126.6(a)–(b).) The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives.

Comment P148-6 If the project does somehow move forward, Design Option E should be required in order to create at least some public benefit in the form of the bridge to the State Historic Park from Broadway.

Response P148-6 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the State Park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment Letter P149 – Daniel Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P149

Comment P149-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,

Daniel Liu

Response P149-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P150 – Amy Hammond

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P150

Comment P150-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,

Amy Hammond

Response P150-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P151 – Jodi Sklawer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P151

Comment P151-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P151-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P152 – Carolyn Weyant

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P152

Comment P152-1 To Whom It May Concern:

You need to think back to the McCourts' involvement with the L.A. Dodgers and how history will most likely repeat itself. The Dodger fans in all of L.A. County - and there are millions of us - will not contribute one penny to this person's ownership in such a project. Here are a few reasons why . . .

Frank McCourt not only mishandled the finances of the Dodgers, he turned the beloved franchise into the laughing stock of the sports world. Seemingly small things such as parking around the stadium became frustrating once McCourt took over the team.

He drove the once-proud franchise into the ground after years of mismanaging the team's funds, refusing to spend on key player acquisitions through free agency and trades, refusing to invest in international scouting, and tanking the farm system. He did manage to hijack the franchise to make himself filthy rich.

So was he a disaster as an owner? Absolutely. But when you consider that he financed 100% of the $430 million he needed to complete the purchase of the team in 2004, plunged the franchise into bankruptcy by 2011, and somehow walked away with almost $1 billion in his pocket, you can't help but admit that McCourt, is as the very least, a savvy businessman who's shrewd tactics made him an extremely wealthy man even if it meant tarnishing the Dodgers iconic brand every step of the way.

Do yourselves a favor and keep this crook out of any money-making venture which will only hurt the people and city and county of Los Angeles.

Regards,
Carolyn Weyant

Response P152-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P153 - Aronriti Mey

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P153

Comment P153-1 This project to build a gondola will not do anything to help the Chinatown community. It will do more harm to the community by erasing Chinese American culture.

Response P153-1 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. The proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P153-2 It will further gentrify Chinatown and bring more unwanted traffic into our neighborhood; residents and business owners already have a hard time finding parking.

Response P153-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines

("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P153-3 It will environmentally impact habitats such as Solano Canyon and the LA River…

Response P153-3 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant.

Comment P153-4 …while also displace Chinatown residents.

Response P153-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P153-5 The history of Dodger Stadium has always displaced low income and working class families; three communities in Chavez Ravine have been erased and destroyed from Los Angeles' History La Loma, Palo Verde, and Bishop. We won't let that happen to Chinatown as well!

Response P153-5 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P153-6 My family has been living in this community for over 20 years and so much has been destroyed and big development companies have come in and changed the landscape of Chinatown for their own profit without giving back to the community at large.

Response P153-6 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P153-7 We want the money that will be spent on this gondola to be put into improving Los Angeles' transportation system and street, road, and parking infrastructure instead.

Response P153-7 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P154 - YueHan Kuang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P154

Comment P154-1 Building a gondola over private houses makes residents afraid, always worried that accidents may happen. Who suggested building a gondola in Chinatown?

Response P154-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P154-2 It would be better to build the gondola above their roofs and see if they have objections. I strongly oppose building a gondola in Chinatown.

Response P154-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P155 - HZ Liu Zhang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P155

Comment P155-1 I strongly support the LA Aerial Rapid Transit project as this project will be able to solve traffic jams in Chinatown, make our business thrive, and clean up the environment. Elite Salon.

Response P155-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P156 - Chuong Zin Bo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P156

Comment P156-1 I fully support building Aerial Rapid Transit in Chinatown. It will benefit Chinatown and help it prosper.

Response P156-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P157 - George Lui

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P157

Comment P157-1 I strongly support it. Agree. California.

Response P157-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P158 - Sher Yuek Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P158

Comment P158-1 I strongly support the LA Aerial Rapid Transit project. Elite Salon.

Response P158-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P159 - Huang Jing

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P159

Comment P159-1 I strongly support the LA Aerial Rapid Transit project. Elite Salon.

Response P159-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P160 - Qing HNG

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P160

Comment P160-1 I strongly support the Aerial Rapid Transit project. It will help (China) prosper. Los Angeles. California.

Response P160-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P161 - RM HU

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P161

Comment P161-1 I strongly support the Aerial Rapid Transit project. It will help (China) prosper.

Response P161-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P162 - Qui Lui

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference

Responses to P162

Comment P162-1 Support the gondola. It will serve residents and travelers of Chinatown.

Response P162-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P163 - Za Ling Zi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P163

Comment P163-1 Chinese: Support the gondola. It will serve residents and travelers of Chinatown. Yuling Li.

Response P163-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P164 - Yi Yang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P164

Comment P164-1 Support the gondola. It will be convenient for citizens. Yi Yang.

Response P164-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P165 - We Xiong Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P165

Comment P165-1 Support the gondola. It will be helpful to Chinatown. An LA citizen.

Response P165-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P166 - Rui Fang Feng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P166

Comment P166-1 I support launching the gondola. It will help traffic and environmental protection. This is a great idea. I hope it can be launched soon. Hill Street Hair Salon.

Response P166-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P167 - Guohui Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P167

Comment P167-1 It is a good idea for LA to pioneer the construction of a gondola. I greatly support it. I hope it can be built soon. It will help keep traffic smooth, while improving the air quality on earth, since the gondola is powered by electricity and there will be no emissions.

Response P167-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P168 – Junyue Liang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P168

Comment P168-1 Support Aerial Rapid Transit.

Response P168-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P169 - Annie Ma

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P169

Comment P169-1 Support Aerial Rapid Transit.

Response P169-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P170 – Jose Silva

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P170

Comment P170-1 This will benefit the communitis in the area

Great Choise

Response P170-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P171 – Kiet Tsan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P171

Comment P171-1 I love this project. I hope it can start as soon as possible.

Response P171-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P172 - Alex Diaz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P172

Comment P172-1 It's a good thing for the fan's and not all have cars to get there and not all have cars to get there.

Response P172-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P173 - Elena

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P173

Comment P173-1 For me, it looks like a good project, less traffic, I like it because there are more traffic lights and more safety.

Response P173-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P174 - Maria Baeza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P174

Comment P174-1 For me, it looks like a very important project, maybe for the future but not for us; however, I think it is good for our children.

Response P174-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P175 - Choo Hue Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P175

Comment P175-1 I support the gondola 100 percent

Response P175-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P176 - Wences Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P176

Comment P176-1 I like the project. It is more convenient because there won't be a lot of traffic. It has happened that when a game is played, I have arrived late to work.

Response P176-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P177 - Isabel Dimas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P177

Comment P177-1 I liked all the information because I didn't know anything about this project.

Response P177-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P178 - Araceli Morales

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P178

Comment P178-1 The information is interesting. I would like to have more information.

Response P178-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to the Draft EIR and this Final EIR for additional information about the proposed Project.

Comment Letter P179 – Disraeli Butler

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P179

Comment P179-1 Great idea to bring Los Angeles into the future, while boosting the economy and spreading diversity to connect our nation and its people.

Response P179-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P180 - Maria Alvarez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P180

Comment P180-1 I think that this project is very important. I think that it is good for the community, especially for the youth, so they can experience something else outside the project.

Response P180-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P181 – Loue Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P181

Comment P181-1 How long will construction be? What jobs come from this project?

Response P181-1 Refer Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR for the proposed Project's construction assumptions. Construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing. It is likely that the labor force from within the region would be sufficient to complete the majority of Project construction. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Comment Letter P182 - Amparo Cabrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P182

Comment P182-1 I like the project, it is a good idea. It is beneficial to the community and to youth in the future.

Response P182-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P183 - Socorro Lugo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P183

Comment P183-1 I agree with this Gondola Project because it is beneficial to the community and to youth in the future, while bringing improvements to the city.

Response P183-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P184 – Lan To

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P184

Comment P184-1 I like your plans about development about communication and landscape

Response P184-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P185 - Sandra Sedano

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P185

Comment P185-1 The project is good if it will be free and more lights are put in the park. I like it as an improvement in the community.

Response P185-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P186 - Marta Prieto

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P186

Comment P186-1 I like this project for everybody else, but I would not ride in it.

Response P186-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P187 – Kin Tsan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P187

Comment P187-1 The project is adorable, especially it could attract tourists for our business in Chinatown.

Response P187-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P188 – Edward Elias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P188

Comment P188-1 I try to use the Gold Line whenever I come into the Downtown of Los Angeles.

When I come to see a Dodgers Game, we have to use the Bus to get to the stadium. Which may take 20-40 mins depending on the gameday time.

The Gondola project would lower time to and from the station to the stadium.

When I drive into the stadium it takes approx. 20-30 min to get in and another 10-20 mins to find parking.

Lets not even talk about 1 hour – 2 hours to just leave the stadium.

The Gondola Project is a blessing for this 74 yr old man!

Thank you for the opportunity to express my gratitude and appreciation.

Response P188-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P189 – Edgar Ramos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P189

Comment P189-1 I like what the gondola brings and want it to improve and connect my city.

I think it would be good to experience the city and bring in more tourism.

Response P189-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P190 - Wendy Ortiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P190

Comment P190-1 I love the idea for my family and me, I am looking forward to riding one of those gondolas! I say "yes."

Response P190-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P191 - Nazario Arreola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P191

Comment P191-1 Nazario Arreola Fregozo 323501765

I think that it is a very interesting idea and that things like this benefit the community.

Response P191-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P192 - Mariana Gomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P192

Comment P192-1 I don’t like it.

I am afraid of riding that thing.

Response P192-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P193 - Karina

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P193

Comment P193-1 Concern: what would happen if a power outage occurs due to weather conditions?

What would be the worst case scenario.

Response P193-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of how backup power would be provided by battery storage located at each station and tower and the non-passenger junction. The battery storage system would be tested on a regular basis and would provide backup power to allow unloading of the system in the event of a power grid failure.

Comment Letter P194 – Gustavo Gonzalez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P194

Comment P194-1 *Good for environmental purposes.

*It will eliminate traffic.

Response P194-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P194-2 Can you ride while under the influence?

Is there any security measures to ensure public safety?

Response P194-2 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination.

Comment Letter P195 – Taylor Nichols

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P195

Comment P195-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P195-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P196 – Mitchell Mom

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P196

Comment P196-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P196-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P197 – Francis Hayes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P197

Comment P197-1 Dear Mr. Cory Zelmer, I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos. Sincerely,

Frank Hayes

Response P197-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P198 – Jennifer Cuevas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P198

Comment P198-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I am a resident of CD1, work in the community, and am greatly concerned about the Gondola development that will negatively impact the neighborhood and set a precedent in the wrong direction for future developments, violating civil liberties and privacy. F

I am concerned about this project for the following reasons:

Response P198-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views.

Comment P198-2 Built Environment:

- The Gondola Project's enormous towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P198-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would

consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P198-3 Traffic:

- The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community...

Response P198-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Contrary to the comment, the Draft EIR analysis reports that the proposed Project would reduce air pollutant emissions in the area. As shown in Table 3.3-5, Maximum Mass Daily Emissions Due to Operation of the Project, of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out)

and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions. As a fixed guideway transit project, providing new high-frequency high speed transit connections between the regional transit hub of LAUS and Dodger Stadium, the proposed Project is forecast to reduce vehicle miles travelled (VMT), as game and event attendees shift their travel mode from driving to Dodger Stadium to utilizing transit on the proposed Project. As an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies (refer to Section 3.8.4 of the Draft EIR and Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for additional discussion). The operational VMT and trips for the existing, Build Out, and Horizon Year that are used to calculate these mobile emissions are presented in Table A.2-3 of Draft EIR Appendix D, Air Quality/Health Risk Assessment Technical Report.

Comment P198-4 …The Gondola Project's will increase traffic around Chinatown and Union Station.

- This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult because of stadium events, nearby County park competing events, everyday commuters and this project will make it worse.

Response P198-4 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P198-5

- Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument

Response P198-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P198-6 Environmental Justice:

- This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P198-6 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P198-7 Gentrification:

- This project will lead to displacement and increase the cost of rent in the area.

Response P198-7 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P198-8 Future development:

- This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P198-8 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property,

for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P198-9 Lack of transparency:

- Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P198-9 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed

Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, (Public Outreach Report), of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period.

Comment P198-10 Lack of community consultation:

- The community has been neglected and our voices have not been heard.
- No one asked us our vision for our community.
- We never asked for this project. We don't need or want this project.

Response P198-10 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P199 - Allen Mom

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P199

Comment P199-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadiu7m.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P199-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P200

This comment number has intentionally been skipped.

Comment Letter P201 – Jay de la Torre

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P201

Comment P201-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P201-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P202 – Derrick Davis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P202

Comment P202-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P202-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P203 – Jennifer Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P203

Comment P203-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P203-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P204 – Peter Saudino

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P204

Comment P204-1 Hello, I'm a Los Angeles resident and I have some thoughts for you. I am writing to voice my opposition to the Gondola project at Dodger Stadium.

The residents in that neighborhood will hate it. It's a huge waste of time and money. And judging from the concept photos we've seen, it's just hideous.

Please don't do this.

Thanks.

Response P204-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with and showcase local

artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Comment Letter P205 – Brian Herrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P205

Comment P205-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are essential in addressing climate change and improving the quality of life for Angelenos.

Response P205-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P206 – Veronica L

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P206

Comment P206-1 I received an auto-reply from Mr. Zelmer's e-mail to contact you in his absence.

Aside from appearing in person, will options be provided for remote appearance via video or teleconference? If so, please provide those. I also respectfully request you include such information on the website for those of us that may not have received notice with this information.

Response P206-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment Letter P207 – Nathaniel Ortiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P207

Comment P207-1 Hello, this message is in regards to the ART proposal.

This LAART project is severely misguided for several reasons.

First and foremost, this project is providing funding for a private enterprise. Metro already subsidizes trips to Dodger Stadium with the Dodger Stadium Express. While these trips are not necessarily the most efficient, they are a marked improvement over the LAART since they provide multiple infill stations, such as Union Station, the J Line infill station (which also connects to the Green Line), and other local connections.

Response P207-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P207-2 Additionally, this project is much more inefficient than improving local heavy/light rail connections. Guggenheim Baseball Management should be fronting the cost for at a minimum of the construction cost of the station, as they are the only stakeholder to actually profit from this venture. As such, they should be subsidizing more efficient projects, rather than subsidizing a for profit venture that simply seeks to profit off of the taxpayers dime.

Finally, any arial transit system is inherently inferior to any current heavy or light rail alternatives due to a lack of passenger capacity.

If there are any questions regarding my statement, please contact me at the following:

Nathaniel Ortiz

Electrical Engineer

Response P207-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P208 - Peter Shek

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P208

Comment P208-1 I have heard that Metro approved for the construction of a Gondola Project to Dodgers Stadium. This is such a bad idea for reducing traffic, especially when there are shuttle bus in place already. Nowhere in the world are gondolas used in a metropolitan area to help reduce traffic. They are generally used for tourists' sightseeing purpose. I urge you to not waste money on this irrelevant project that will obviously be unlikely to resolve any traffic issues to the Dodgers Stadium. Instead, please focus on resources we already have, which are excellent bus fleets that are readily available.

Response P208-1 The proposed Project is currently in the environmental review process under CEQA and has not been approved for construction. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Refer to Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, which provides examples of gondola systems in cities around the world which serve as a feasible mode of urban rapid transit. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses and that have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time

competitive transit trips from more locations in the region. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P209 - Peter Shek

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P209

Comment P209-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

This is a waste of money and completely irrelevant idea / proposal when there are already shuttle busses. Busses can also take at least 50 cars of the road if they are fully loaded each trip. If they are underutilized, the Metro is responsible for promoting it more like they do for new rail lines. Building a fancy gondola is not going to solve traffic problems.

Response P209-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the

proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P210 - Jean Brandtt

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P210

Comment P210-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). It is an affront to residents and a huge expense for voters.

Response P210-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P211 - Kristen Wo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P211

Comment P211-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P211-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P212 - Andrea Valverde

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P212

Comment P212-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Please, this is not the answer to easing traffic in the area and will cause more problems than it solves. The neighborhood does not want this.

Response P212-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter P213 - Manori Sumanasinghe

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P213

Comment P213-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P213-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P213-2 The Gondola Project's enormous towers will cause aesthetic impacts in my community. We finally have a beautiful natural environment in Chinatown that is safe for our children and the elderly. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P213-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed

Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P213-3 The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult because of unmanaged traffic during game days in the immediate neighborhood and this project will make it worse. We've had to wait 10-15 minutes to get to our parking lot at Blossom Plaza by the Metro station during game days due to traffic congestion. This is going to make things worse.

Response P213-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit

connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P213-4 There is also lack of transparency from the Metro. There is a clear lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community. We live AND work in Chinatown. Our voices need to be heard.

Please stop this project and ask us what we want. There is clearly a better way to do this.

Response P213-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in

the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including coordination with identified stakeholder groups.

Comment Letter P214 - Reagan McClymonds

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P214

Comment P214-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

These were my comments on Urbanize LA relative to an update on the project. I stand by them 3 months later. The public/City of LA/MTA are being sold a bill of goods.

Response P214-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment also provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P214-2 to P214-6.

Comment P214-2 I am not a homeowner and have no skin in the Chinatown game. I am, however, able to do basic math and do not get distracted by shiny objects.

Response P214-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P214-3 1) Proposed Car Capacity is 30 per car (see link below). 5,000/hour means 30 people are loaded and moving every 20 seconds. No way. If one counts two-way traffic, we now have 2,500/hour capacity going one way which is all that matters in this circumstance (and that requires 40 second headways which is likely a gaping stretch too). That's borderline fraudulent advertising since:

Response P214-3 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds. The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the

total, calculated system capacity is therefore 5,478 pphpd. To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd.

Comment P214-4 2) People do not go to Dodger Stadium after the game is over and people generally don't leave before it ends (certainly innings 1-6, let's say). That means the real capacity is 2,500/hour which still requires believing 40-second headways, which I do not.

Response P214-4 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station.

Comment P214-5 3) But even if one still has faith in 2,500/hour capacity, to get utility out of that number means 1,250 have to arrive 30 minutes before the game and 1,250 have to leave 30 minutes after the game. That will not sit well with fans over long term.

Response P214-5 Refer to Response P214-4 for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment P214-6 That is an ineffective transit solution for an edifice with a capacity of 55,000 holding time sensitive events. And this gondola only gets one to Union Station where riders are still facing painful train/car commutes to get home at 10-11 PM on most nights.

As a measure of comparison, an NYC subway could transport 2,500 people in less than 10 minutes.

Add it all up and this is a total failure in waiting. But it might have nice views of downtown.

Response P214-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but

there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of post-game transportation.

Comment Letter P215 - Thomas Britt

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P215

Comment P215-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). The unsightly towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P215-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium.

Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to

the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P215-2 The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P215-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction

of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P215-3 Also, this project will lead to displacement and increase the cost of rent in the area.

Response P215-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P215-4 More importantly, I am objecting to the lack of transparency on this project. Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? The community has been neglected and our voices have not been heard. No one asked us our vision for our community. We never asked for this project. We don't need or want this project. Stop bowing down to the uber-wealthy class and listen to the citizens of this city for once.

Response P215-4 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom

webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including coordination with identified stakeholder groups.

Comment Letter P216 - Hayley Marcus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P216

Comment P216-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P216-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P217 - Nancy Hoven

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P217

Comment P217-1 As a resident of the greater community surrounding Dodger Stadium and Echo Park, I wish to express serious concerns about the proposed gondola project between Union Station and Dodger Stadium.

Response P217-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P217-2 First, I feel there has been insufficient public input and a real lack of communication with community stakeholders. We will have to live with the daily burdens placed upon neighborhoods if this project is completed. This may include increased traffic, parking problems, and pollution generated by the project; the visual impact of the towers; and possible displacement of residents and/or businesses. Frankly, since this project seems to have been jump-started without sufficient communication with the communities, it is unclear what all of the potential impacts will be.

Response P217-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed

Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P217-3 Second, as a former municipal employee who has had to follow standard procedures for open bidding for contracts, I don't understand why Metro has not followed this procedure. Did the investors simply negotiate with Metro without due public process or without conforming with typical governmental process for such projects? Does the public know how much this will cost and how much of that burden will be placed upon taxpayers? How much will the developers of this project contribute and how much will they gain in profit? All unanswered questions, which is unacceptable.

Response P217-3 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P217-4 Finally, is this really a necessary project when existing Metro transportation services are not working at the highest level of performance, safety, and cleanliness? More people on a daily basis would choose to use public transportation if it were more reliable, frequent, cleaner, and most importantly, safer. I have transportation options and used to use Metro quite frequently, but now it seems so unsafe and unclean, that I seldom use it. Others, with fewer options, are compelled to use public transportation for work or other activities. I think it's unfair to "indulge" Dodger fans and tourists with an expensive, novelty form of transportation, while others are just trying to live their lives of work, school, shopping, and recreation often on limited incomes. I don't think the majority of Metro users can afford $30 a ride.

Response P217-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P217-5 I strongly urge you to reflect on your commitment to provide accessible, affordable, and safe transportation to ALL the residents that Metro serves, not special projects proposed by investors and for the benefit for a relatively small sector of the total metro population.

Response P217-5 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents,

workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P218 - Ann Dorsey

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P218

Comment P218-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium) for the following reasons:

Response P218-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Responses to comments contained in this letter are provided in Responses P218-2 through P218-7.

Comment P218-2 Built Environment:

The Gondola Project's enormous towers will cause aesthetic impacts in the community such as the obstruction of views and the gondola cars being used for advertising and electronic billboards.

Response P218-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at

Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P218-3 Traffic:

The Gondola Project's will increase traffic around Chinatown and Union Station because it is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult because of air quality impacts from tailpipe emissions and this project will make it worse.

Response P218-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections

to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P218-4 Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P218-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR. As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P218-5 Gentrification:

This project will lead to displacement and increase the cost of rent in the area.

Response P218-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P218-6 Future development:

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P218-6 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property,

for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P218-7 Lack of transparency:

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P218-7 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P219 - Janna Wheeler

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P219

Comment P219-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P219-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P220 - Kate Wolf

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P220

Comment P220-1 I am writing to voice my strong opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Chavez Ravine is already a much contested site in LA's history. As I'm sure you're aware, the construction of Dodger Stadium displaced many generations of families who were promised affordable housing that never came to be. This is a shameful aspect of LA's past that has never been fully addressed or repaired. Building the Gondola project would only add insult to injury.

Response P220-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. The public outreach for the proposed Project was designed with environmental justice principles in mind, and the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. The Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and the proposed Project is consistent with General Plan policies related to environmental justice, including by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements, and by ensure quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements.

Comment P220-2 As a resident of Northeast Los Angeles, I have watched Chinatown slowly hollow out in the last decade-and at an alarming rate ever since the pandemic. The once lively, unique, and ethnically diverse neighborhood has more and more empty storefronts and, unfortunately, more and more horror stories of displacement, particularly of senior citizens from their homes. It's hard to see how the Gondola will do anything to redress these sad developments or make the lives of longtime residents better. It stands to only further fracture the neighborhood and increase pollution, gentrification, and traffic while making a historic area of Los Angeles much uglier

(which may seem like a shallow complaint, but I assure you, it's not. Everyone deserves to live in a beautiful neighborhood and unsightly infrastructure is often only foisted on the less affluent--see the history of LA's freeways.) Meanwhile, I believe the people who really stand to benefit from the Gondola's construction are the owners of the Dodgers and of Dodger Stadium.

Response P220-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. In addition, the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P220-3 In this day and age, when the city is in such disarray and homelessness is surging yet again, should we really be acting in favor of the already super-abundantly wealthy? I urge you to put the whole city's wellbeing at stake and deny this project. We can no longer change the damning history of Chavez Ravine, but you have the choice, and the power, to change its future.

Response P220-3 Refer to Response P220-1 for discussion of how the Draft EIR addresses environmental justice. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P221 - Polonia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P221

Comment P221-1 Subject: No to McCourt's project

Response P221-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P222 - Jean Brandt

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P222

Comment P222-1 1. NO gondola. It is an affront to residents and a huge expense to voters.

Response P222-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P223 – Paul Newman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P223

Comment P223-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I fail to see the need for it and once again feel like the McCourt family has been allowed to inflict their selfish agenda on the city.

Paul Newman

paulvnewman@gmail.com

220 So Irving Blvd

Los Angeles, California 90004

Response P223-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P224 – Lance Paris

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P224

Comment P224-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P224-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P225 – Elizabeth Codiga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P225

Comment P225-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I am a 74 year old Los Angeles homeowner who frequents Chinatown and relies on access to the Historic State Park. I have watched the park grow and become more beautiful with each passing season. It provides me with a lovely, safe place to walk, and I see how the workers strive to continually maintain and develop the area. The park has been a perfect place to teach my grandsons, 6 and 8 years old, the wonders of urban nature and provides a great space for them to practice skateboarding and bike riding. The Gondola Project will greatly diminish the entire area, to benefit only a few with all the negatives we already face in much of LA; traffic, pollution, parking, noise and visual ugliness.

Response P225-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/ State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of users to continue at the Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment P225-2 Chinatown, often ignored by the rest of Los Angeles, is an important historical community that would be horribly affected by the Gondola. The residents and business owners don't deserve this without at least greater community input. The Park and its surrounding neighborhood belong to the people and to history.

Response P225-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer also to Topical Response C, Project Features, for discussion of the

potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment Letter P226 – Nelson Abreu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P226

Comment P226-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I live and work in Chinatown/Lincoln Heights. This “gondola” project is not what would come out of an RFI or university study on alleviating transportation issues related with Dodger Stadium.

Response P226-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P227 – Mary Koetting

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P227

Comment P227-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P227-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P228 – Catherine Wu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P228

Comment P228-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

As the daughter of a proud Chinatown business owner of nearly 30 years, I grew up supporting local businesses and hold many past and present community members close to my heart. I strongly oppose “The Gondola” project because it does not serve or represent us:

Response P228-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team’s outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project’s features to enhance and provide additional benefits to the surrounding communities, including for businesses in Chinatown.

Comment P228-2 (1) The structure will disrupt the skyline and ruin the aesthetic of the Los Angeles State Historic Park. I remember anticipating the opening of this park as a kid, and it would be a shame for “The Gondola” to impact this gem.

Response P228-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P228-3 (a) I worry that gondola cars will be plastered with advertising and ruin one of the few green spaces in the community.

Response P228-3 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. The proposed Project's design ensures that signage would enhance the public realm, and signage would be architecturally integrated into the design of the system, including its cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P228-4 (b) Having gondola cars fly so close overhead is unsettling and dangerous. I am concerned park goers will be deterred by the large, shadowy cars, the increased noise, and the potential debris fallout. This would detract from the tranquility of the park and would make the park appear unsanitary, thereby hurting businesses at the resident farmer's market.

Response P228-4 As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Response P228-2 for discussion of the aesthetic impacts of the proposed Project to the Park, which would be less than significant. As detailed in Section 3.13, Noise, and Appendix

M, Noise and Vibration Technical Report, of the Draft EIR, operational noise impacts, including cabins, would be less than significant. As discussed in Section 2.0, Project Description, of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P228-5 (2) This project was pushed forward behind closed doors. Why was there an absence of open public process and competitive bidding? Who is paying for this project? These unanswered questions give the impression of corruption/collusion favoring private interests—public good should be the only goal. The lack of community engagement for this project just adds insult to injury.

Response P228-5 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and

the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P228-6 (3) The design of the structure further reinforces community erasure. The generic silver building does not reflect the rich, cultural diversity and history of the community. Instead, the architecture mirrors the "modern" apartment buildings that are already gentrifying the area. We don't want or need another symbol of gentrification, and this project would only displace more vulnerable residents and hike up rent prices.

Response P228-6 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder groups.

Comment P228-7 (4) Our community deserves clean air and environmental justice. This project will redirect and increase traffic in the area, which worsens noise and air pollution. Residents already suffer disproportionately from tailpipe emissions; don't overburden us with even more.

Response P228-7 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to

improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Contrary to the comment, the proposed Project would reduce air pollutant emissions in the area. As shown in Table 3.3-5, Maximum Mass Daily Emissions Due to Operation of the Project, and discussed in Section 3.3.4 of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles travelled and thereby decreasing emissions compared to existing conditions. As a fixed guideway transit project, providing new high-frequency high speed transit connections between the regional transit hub of LAUS and Dodger Stadium, the proposed Project is forecast to reduce vehicle miles travelled (VMT), as game and event attendees shift their travel mode from driving to Dodger Stadium to utilizing transit on the proposed Project. As an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies (refer to Section 3.8.4 of the Draft EIR and Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for additional discussion). Refer to Section 3.3.4 of the Draft EIR, and Table A.2-3 of Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR for the operational VMT and trips for the existing, Build Out, and Horizon Year that are used to calculate these mobile emissions.

Comment P228-8 I urge you to cancel the Los Angeles Aerial Rapid Transit Project. The potential for harm overshadows any benefit.

Thank you for your time.

I am a visitor and supporter of the community, family member of workers in the community, and an outdoor educator and ecologist.

Response P228-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P229 - Emily Moncata

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P229

Comment P229-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I live in the neighborhood of Angelino Heights, so I am familiar with the traffic and congestion that occurs, especially around Sunset/Douglas in the lead up to Dodgers games and stadium events (the bottom of our lovely hill!). That being said, I still am opposed to this project, because the research does not adequately demonstrate that the disruption, fanfare, and purpose of this project will meaningful reduce congestion in the neighborhood, and benefit the greater public good.

Response P229-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion

of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P229-2 Furthermore, this is not a community serving project. As it stands, there is no rail connectivity in the neighborhoods of Echo Park and Silverlake. Instead of a community serving transportation project that could connect residents to major transport hubs through innovative public infrastructure, this gondola serves one purpose and one purpose only: to whisk tourists into the hills of Elysian park to attend major sporting events at Dodgers Stadium. It reminds me a bit of Angels Flight, or what the Roosevelt Island Gondola has become in New York– it operates as a spectacle more than it serves an actual, urgent transport need. And when the projects LA Metro can take on are supposedly so limited by resources, I don't think this is where residents want to see a priority investment made. Even in the 50 year transport plans, there remains little connectivity for these neighborhoods. Is this really where we want to prioritize an investment? It may be in the neighborhood, but it's not for the neighborhood.

Response P229-2 Refer to Response 229-1 for an overview of the need for the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 2.01, Overview of the Project, of the

Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P229-3 And it doesn't even make a meaningful dent in the congestion problem it claims to address. Next, on every tourist to-do guide will be a must-see trip on the Dodgers stadium gondola. But for actual residents of the city, this billionaire passion project has little day-to-day relevancy. There is nothing else up in that parking lot besides Dodgers Stadium. There is no plan for public infrastructure that could bring those people to public gathering places and hiking trails in Elysian Park, no way for residents who, of course, do not live in the parking lot of a major MLB stadium, to access shops and grocery stores, link up to major train stations, and access by rail a greater map of the city. It's very clear who this project is for, and it's embarrassing to call this a public transportation project, when it so clearly serves a private sector. I really hope LA Metro can acknowledge the limited relevancy of this passion project, and can fulfill its duty to the public good, and invest in smart, sustainable, community-serving public transportation with connectivity and far-reaching IMPACT that Los Angeles so desperately needs.

Response P229-3 Refer to Response 229-2 for an overview of the need for the proposed Project. The proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal

options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment Letter P230 - Bert Glatstein

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P230

Comment P230-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). The level of either incompetence or corruption leading to this project is mind boggling. How can city officials reaches deal with serial bankrupteee McCourt? This is obviously a precursor to development of a retail/recreation site in the Dodgers Stadium parking lot. Yet there has been no provision for an EIR. an absolute boondoggle

Response P230-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Accordingly, the Draft EIR analyzes the whole of this action, as well as reasonably foreseeable potential environmental impacts resulting from this action. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment Letter P231 – Jamie Patterson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P231

Comment P231-1 First off, WHO ASKED FOR THIS? Literally NO one in the community wants this stupid Gondola and this won't actually do anything to help dodger traffic. I lived on sunset blvd for years and though I was priced out of Echo Park, I still work there and NOTHING about this project will do anything actually help the community.

Response P231-1 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P231-2 HOW hell did Metro approve this this far? This idea should've been laughed out of consideration and it's appalling I even have to write a letter to you opposing this.

Response P231-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P231-3 Consider this my formal opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium) and please PLEASE don't waste Los Angeles money on such a stupid pointless idea that will negatively affect the entire community around Dodger stadium and help only Frank McCourt. There's also no way this will actually take 3,000 cars off the road during dodger season. And why destroy the neighborhood, subject elderly folks homes to a gondola whizzing by their windows of their home nonstop during games for…a stupid gondola? Cue Simpsons Monorail jingle.

Response P231-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P232 – Jane O'Neill

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P232

Comment P232-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P232-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P233 – Laurel Randolph

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P233

Comment P233-1 Hello. I am a Los Angeles resident and I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I have major concerns about the impact on traffic, historical sites, and commercial development in the area. There's been a total lack of transparency that's deeply concerning as well.

Response P233-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. The Draft EIR addressed historical resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resources Technical Report of the Draft EIR. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public comment during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion.

Comment P233-2 I do not believe this is an effective use of time and money, and will only further gentrification. LA Metro should serve the better good of the people of Los Angeles, and a flashy, pointless project like this is not the way to do it. Thank you.

Response P233-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P234 – Jill Stevens

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P234

Comment P234-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I am a resident of Los Angeles and concerned about this project that seemed to be pushed through while the community has been neglected and our voices have not been heard.

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P234-1 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be

sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P234-2 Dodger Stadium was already stolen from the residents of Chavez Ravine, and this project only continues that legacy. Ultimately leading to future commercial development in Chavez Ravine, without community input and without disclosure to the community. Sound familiar ?

Response P234-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P235 – Dorothy Braudy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P235

Comment P235-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). The voices of regular citizens should be involved in such a drastic decision. Studies of the impact should be made public and published in the LATimes. PLEASE let's don't have another Chavez Ravine or Bruce's Beach.

Response P235-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of how electronic copies of the Draft EIR are and have been available on Metro's project website and the proposed Project's SB 44 website since the Draft EIR was released on October 17, 2022. Hard copies of the Draft EIR were also available at three City libraries in the Project area (Central Library, Chinatown Branch Library, and Cypress Branch Library) and Metro Headquarters' Dorothy Peyton Gray Library, and at the in-person public meetings during the Draft EIR public review period. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P236 - Max Maslansky

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P236

Comment P236-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). It will do nothing to mitigate traffic or very little and only increase safety concerns and exacerbate gentrification of this area.

Response P236-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation.

With respect to concerns of gentrification, Refer to Topical Response E: The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P237 – Julie Williams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P237

Comment P237-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This project has not had proper community input, it is a tourist attraction that provides little or no benefit to the community and will invade residents privacy and lessen their quality of life.

Response P237-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views.

Comment P237-2 The project will not lessen traffic or improve air quality in any significant way.

Response P237-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P237-3 I live near by and ride my bike through Chinatown. I have seen the gentrification and displacement of local residents over the years and it seem to me this is another vanity project by a wealthy developer at the expense of the local community.

Response P237-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P237-4 Frank McCourt would never allow a Gondola to be built over his house! Please take more time and listen to the community. The city needs real workable solutions to amusement rides.

Response P237-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P238 – Aristotle Acevedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P238

Comment P238-1 I'm writing to give my opinion on the proposed aerial rapid transit gondola. I understand the need to alleviate traffic around Dodger stadium but I think this is the wrong way to go. I think it will be an eye sore and ruin the beautiful views of the city we already have. I think it will also be a safety hazard in the event of an earthquake or other emergency inside or around the gondolas. Please do not approve this plan!

Response P238-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety

procedures developed in conjunction with the operator, system provider, and local authorities. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR for discussion of how the structural design of the proposed Project's stations, junction, and towers would meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety, and the proposed Project would adhere to its Emergency Operations Plan which would include emergency response protocols and state that in the event of a major earthquake the system would be fully evacuated and shut down, and would not operate.

Comment Letter P239 – Kama Hayes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P239

Comment P239-1 Hello - I want to voice a strong opposition of this Gondola Project.

Response P239-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P239-2 First of all, this would destroy views to an already compromised area of Union Station and Puebo de Los Angeles. This is one of the oldest and most historic areas of Los Angeles and should not be altered any further. It's bad enough that the hideous apt building took over part of the Union Station lot Secondly, this area has become very dangerous and is highly populated with homeless and has not been given any extra security.

Response P239-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe and The Winery), the El Grito mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project.

Comment P239-3 Thirdly, this project just isn't necessary and would be very costly and would have a negative impact on the area during construction and for the long term future. Not only that, it has such a finite use and Dodger Stadium isn't even open for games but for part of the year. WHY? This project is a total joke and there are far bigger traffic concerns in a ton of other parts of Los Angeles.

Vote NO on the Gondola Project!!

Response P239-3 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As summarized in the Executive Summary of the Draft EIR, the proposed Project would have less than significant impacts related to construction with the exception of Noise and Vibration (human annoyance). Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support during construction. As summarized in the Executive Summary of the Draft EIR, impacts related to operations of the proposed Project would be less than significant. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel.

Comment Letter P240 – Christian Arana

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P240

Comment P240-1 I am a resident of the City of Los Angeles, and a lifelong Dodger fan. I am also firmly opposed to the construction of the Dodger Stadium Gondola.

Response P240-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P240-2 To start, the Gondola Project was never a community priority. As a city that prioritizes the input of its neighbors, this stands in opposition to the values we espouse as a city.

Response P240-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P240-3 Second, I am deeply concerned about the unintended consequences this Gondola will bring to the neighborhood. Already local residents are dealing with traffic congestion and high rents, and bringing an unwanted attraction to the neighborhood will further exacerbate these problems.

Response P240-3 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P240-4 Third, the Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P240-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P240-5 Finally, if the problem is that Dodger games cause way too much traffic, and that this Gondola is a solution, then that is wrong thinking. For instance, I commute from the San Fernando Valley all the way to Union Station to take the Dodger Express Bus. If such a bus existed in the San Fernando Valley, perhaps be even based at the North Hollywood or Universal Metro Stations, then I am confident that many Dodger fans in the Valley would choose to use this transportation over driving into the Stadium. Think of how many cars we'd remove from the roads if that was an option.

Response P240-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during

the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment Letter P241 – Dylan Sittig

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P241

Comment P241-1 I am writing to express my concern about the LAART project and the environmental impacts that it will have on the community and the City.

While the Environmental Impact Report (EIR) brings to light certain impacts of the project on the environment, the simple fact is that the negative impacts of this project go beyond the scope of an EIR and California Environmental Quality Act review (public funding, privacy concerns, etc.). The EIR lays out the potential for significant and unavoidable impacts and relies on questionable mitigation measures to attempt to address significant impacts.

There is no way that the undefined potential benefits of this program would possibly outweigh the clear and obvious negative environmental and societal impacts associated with the construction and operation of the Project. I urge you to halt this program as soon as possible.

The Project is not community serving and does nothing to enhance mobility for existing Chinatown residents. Ample public transit service between Union Station and Chinatown already exists in the form of numerous Metro Buses, multiple DASH buses, the Gold / L Line, and it is a very short walk. In no instance will the non-game day head ways be more efficient than many of these other pre-existing transit options.

There will be negative impacts to the efforts to increase the Union Station Alameda forecourt. Having an obtrusive tram station will detract from the pedestrian realm and is antithetical to the type of street activation that is desired near Olvera Street and along Alameda Street.

Additional exploration of the Transportation Systems Management Alternative should be further explored. The project objectives were too narrowly defined in a way that doesn't truly serve the needs of the people of the City of Los Angeles, or the residents of Chinatown.

If the project does somehow moveforward, Design Option E should be required in order to create at least some public benefit in the form of the bridge to the State Historic Park from Broadway.

Response P241-1 This is a duplicate of Comment P148-1. Refer to Response P148-1.

Comment Letter P242 – Aaron Y.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P242

Comment P242-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P242-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P243 – Daniel Samiljan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P243

Comment P243-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Literally no one wants this.

Response P243-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process.

Comment Letter P244 – William Campbell

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P244

Comment P244-1 As a community stakeholder, frequent visitor to Los Angeles State Historic Park and a lifelong Angeleno and Dodgers fan I am opposed to the Los Angeles Aerial Rapid Transit Project (aka "The Gondola" at Dodger Stadium). I am concerned about this project for the following reasons:

Response P244-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P244-2 through P244-5.

Comment P244-2 The Gondola Project's towers will cause aesthetic impacts in my community by obstructing views, and the gondola cars will no doubt be used for all manner of advertising. Additionally, the project will open the region around it to the potential for unchecked development that could end up displacing longtime residents and changing the character of these long-standing neighborhoods.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's Sign Concept Plan. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the system, including its cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P244-3 The Gondola Project will not reduce traffic but instead will simply displace it from Dodger Stadium into and around Chinatown and Union Station, making already difficult traffic conditions worse and further compromising air quality for the area residents and park visitors.

Response P244-3 Refer to Section 3.03, Air Quality, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would

result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft, and recommended the proposed Project work with Metro to identify a transit partnership to further encourage proposed Project riders to take transit, walk, or bike to the proposed Project's stations.

Comment P244-4 The lack of transparency involved in the development of this project is infuriating. Metro appears to have moved forward without an open public process and without competitive bidding, leaving the appearance of an apparent disdain Metro has for the the communities that will be directly impacted on a variety of levels.

Response P244-4 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and

Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P244-5 By and large the communities don't want this project. Show me one community stakeholder who asked for it -- besides Frank McCourt. And his connection to the community only involves how much money he can make at their expense.

Response P244-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P245 – Nicholas De Dominic

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P245

Comment P245-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P245-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P246 – Tyler Tharp

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P246

Comment P246-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

Response P246-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P246-2 The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P246-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P247 – Andrew Mueth

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P247

Comment P247-1 I'm a resident of Echo Park 90026 and a Dodger fan and I'm writing to express my opposition to the LA ART gondola plan in its current form. Gondolas are fun, taking public transit is fun and an essential part of LA's future, and the gondola is a way to increase Metro ridership and visibility.

Response P247-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P247-2 - Will the gondola generate revenue to improve metro services across Los Angeles, or will it fuel profits for Frank McCourt's private company?

Response P247-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P247-3 - Will the Dodger Express bus remain operational? If the Dodgers want to "get cars off the street" as a recent article said was the goal, why is Metro not fighting instead for permanent bus-only lanes on Sunset along the Dodger Express route? And why is it not working with scooter rental companies to paint scooter lanes and allow use of zero-emission motorized scooters on Dodger property? Or building MetroBike docks and increasing the number of pedal-assist e-bike docks at the stadium?

Response P247-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Funding sources for Dodger Stadium Express are not known beyond the 2023 season, but the proposed Project would not preclude the continued operation

of the Dodger Stadium Express, which would provide further transit capacity to Dodger Stadium. Despite the slower travel time, some riders may prefer to continue riding the service. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. The proposed Project would also not preclude the implementation of any of the additional mobility options described in the comment. Making bus only lanes permanent or all day, and painting scooter lanes, would be subject to the approval and implementation by the City if Los Angeles who own street right of way.

Comment P247-4 - As Metro continues building a citywide transit network, why does the gondola have so few connections to the rest of the Metro network? This is an expensive project for something that will only be used 62 days a year for a few hours around gametime.

Response P247-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P247-5 I fully support Metro's efforts to increase transit ridership to and from Dodger games, but I cannot support this plan until these concerns are addressed.

Response P247-5 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project

alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Responses P247-2 through P247-4 for discussion of the purpose of and need for the proposed Project.

Comment P247-6 Instead of creating a new, untested transit method, why not make less expensive infrastructure improvements to increase the use of transportation options for which there is already proven demand? Most importantly, as someone who took the Red line to work for years, why would Metro not want any new Dodger-related plans to increase their revenues, instead of allowing a private company to edge in on your turf? Have a backbone! Don't bow to billionaires!

Response P247-6 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P248 – Jules Cote

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P248

Comment P248-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project. I am concerned about this project for the following reasons: The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument. The gondola will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions. And the project will lead to displacement and increase the cost of rent in the area.

Response P248-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P249 – Sophie Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P249

Comment P249-1 Hope this email finds you well.

This is Sophie Li, a reporter with The Epoch Times.

I am writing a story about the Dodger Stadium gondola project that LA Metro is working on. Do you have any press pictures that we can use for the gondola?

Please let me know at your earliest convenience. If you can get back to me by 3 p.m. today, it?ll be much appreciated.

Thank you!

Response P249-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P250 - Kate Wolf

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P250

Comment P250-1 Hi, I'm a community member and I wrote a letter to Corey Zelmer but I also wanted to just leave a message voicing my opposition to the gondola project. I can't make it to the public hearing on Thursday. But I just wanted to say that I live in Northeast LA. I don't see any positive benefit to this gondola project for the people that actually live in these neighborhoods. It seems to just benefit the owner of the Dodgers and the owner of Dodger stadium. And I think it sounds like a really disruptive project, environmentally hazardous. It sounds like it would also pull the thread apart of the Chinatown neighborhood and the most historic district of Los Angeles even more. And add to the kind of blight that is surrounding that area now. And I just, I think, that the people who live in the neighborhood, their, their quality of life should be put first. And I don't think this project will, you know, increase that quality of life and that's why I am voicing my strong, strong opposition to it. And I hope that Metro will not go ahead with this project. My name is Kate Wolf, and no need to call back. But please mark my opposition. [phone number given] I live in Highland Park, 90002 is my zip code. Thank you.

Response P250-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how the proposed project would have less than significant impacts related to hazards and hazardous materials. Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment Letter P251 – Sarajo Frieden

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P251

Comment P251-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). The Gondola Project will have detrimental impacts on the historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument. Regarding environmental impacts, this project will increase the impacts of air pollution from vehicle emissions. These areas already are overburdened by air emissions. This project will also lead to increased rental costs and therefore displacement for those in our communities who can't afford the increases.

Response P251-1 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P252 – Bob Vanderet

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P252

Comment P252-1 With all due respect, this project appears to me to be an incredible waste of public resources for what is essentially a private venture - the Los Angeles Dodgers. i am a huge Dodger fan myself. But the taxpayers shouldn't be footing the bill to make it easier for baseball fans to attend games. Seriously, this needs to be jettisoned now.

Response P252-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project and Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P253 – Tom Williams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P253

Comment P253-1 Project description, assessments, and alternatives considerations are totally inadequate and incomplete and without engineering and construction considerations and descriptions. Many references mention future studies, engineering, and designs to be done before construction, but all such would be without public review and comments and thereby not in compliance with CEQA.

Response P253-1 This comment is noted and will be provided to the decision makers for review and consideration. This is a duplicate of Comment GO18-1. Refer to Response GO18-1.

Comment P253-2 Although Goals/Purposes and Objectives are required for a DEIR, this DEIR provides vague and ambiguous descriptions and totally inadequate development of the Project, its objectives, and its alternatives and their numerical/quantified comparisons. Thus, the discussion of alternatives and Project and their numerical/quantified comparisons are totally inadequate.

Response P253-2 This comment is noted for the record and will be provided to the decision makers for review and consideration. This is a duplicate of Comment GO18-2. Refer to Response GO18-2.

Comment P253-3 Although directly related to the DEIR descriptions and assessments, the DEIR does not even minimally use/mention the LA City Department of City Planning database, ZIMAS, which must be fully incorporated if the Project is to be placed within the City of Los Angeles. As no Memorandum of Understanding or Agreement between the sponsor, Metro, and City of Los Angeles is provided or even mentioned, this absence is understandable avoidance, but renders the DEIR unacceptable, incomplete, and inadequate.

Response P253-3 This comment is noted and will be provided to the decision makers for review and consideration. This is a duplicate of Comment GO18-3. Refer to Response GO18-3.

Comment P253-4 Without an adequate and complete DEIR, alternatives to the proposed Project cannot be adequately formed and compared. Thereby the consideration of alternative cannot be considered adequate nor complete, but should include ZE/NG buses and dedicated bus lanes and perhaps with congestion pricing for DTLA and the Project site.

For detailed comments see attached, including pertinent identified portions of the DEIR with highlighted issues of the current texts for the specific comments.

Response P253-4 This comment is noted and will be provided to the decision makers for review and consideration. This is a duplicate of Comment GO18-4. Refer to Response GO18-4.

Comment Letter P254 – Gloria Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P254

Comment P254-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I'm a resident of this community and a Dodger fan. The Gondola Project's enormous towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards. This project will lead to displacement and increase the cost of rent in the area. We never asked for this project and we don't want this project.

Response P254-1 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting. No digital signage is proposed on the exterior of the cabins. Refer to Topical Response E, the Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process.

Comment Letter P255 – Melissa Arechiga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P255

Comment P255-1 My name is Melissa Arechiga and I stand here before you as a representative of the surviving families that were violently evicted from Palo Verde, La Loma, and Bishop three Mexican indigenous communities that were destroyed to build Dodger Stadium. I am here today opposing the gondola project from Union Station to Dodger Stadium. Well, this may be exciting to some it is a sign of change and change that is not inclusive to all specific people of color. The Dodger corporation and the city of Los Angeles have a long partnership together working to destroy and exploit communities of color. The gondola represents gentrification the destruction of not only our communities but the environment and our beloved wildlife. The gondola project is no different than the deal that was made to take away our family's generational wealth by destroying our three communities to build Dodger Stadium. The Dodgers and the Los Angeles City council set to build the gondola in the middle of our communities and this would only benefit the Los Angeles Dodgers. Our residences and small business owners will suffer with this so-called revitalization project which is a code word in communities of color as gentrification a long time term that leaves are most vulnerable community members displaced with no benefit. The history between the Los Angeles Dodgers and the Los Angeles City council has left our city in worse condition from the deal in the 1950s when our homes in our three communities were destroyed and the lies that were told to the public about building public housing today leave us with the current issues of our houseless and affordability crisis that affects us all today. It is a win-win for the Dodgers and has been since Black Friday, May 8 1959 when our three communities were bulldozed and our families drugged out. It is time to put a stop to the Dodge corporation exploiting the people of Los Angeles. I strongly urge that everyone in the public and all elected officials oppose this project as it will have damaging effects that will last from generation to generation.

Response P255-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice

principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the proposed Project would not have a significant impact on biological resources.

Comment Letter P256 – Carol Ng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P256

Comment P256-1 Although I agree with the idea of a non-polluting means of getting people to Dodger Stadium, I don't believe the Gondola Project is the answer.

Response P256-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P256-2 1) The Gondola idea was generated by former Dodger's owner, Frank McCourt. McCourt still owns the property around the stadium and benefits from the parking receipts. He probably thought of the Gondola Project as another way to earn more money. Currently, parking for drive up cars is $30. If one obtains a pre-game parking ticket, it costs $25. Although no Gondola fare amount has been set, it's rumored it will be about $5 less than the above fees or about $20. Of course by the time the project is completed, who knows how much the parking fee will be?

Response P256-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P256-3 2) The project will include towers and cables and a station at the stadium. The towers will cross Chinatown and other buildings and residences. This could displace some residents and provide unsightly views for others. This would qualify as a "not in my backyard" situation.

Response P256-3 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for

discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P256-4 3) Dodger Stadium is located in Elysian Park, a large, relatively under-developed open-space providing walking/hiking areas and sports and recreation venues. It is host to wildlife that would be disturbed and displaced by the construction and operation of the Gondolas. It could disrupt the airspace of the birds.

Response P256-4 As discussed in Section 5.0, Corrections and Additions, of the Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project (e.g., the lack of shield wires, the inclusion of slack carriers, presence of moving gondola cabins, and vinyl window film) are likely to reduce the risk of avian collisions in comparison to transmission lines.

Comment P256-5 4) The promoters try to cite the Gondola Project as a functional benefit for the city. Instead, it will merely be a tourist attraction that will become a destination, much like the Hollywood sign. Others hope it will be in operation in time for the Olympics. They also try to say this will provide transportation for the local residents, but don't

mention having additional stops or stations along the route. Would it require the residents to hike into the stadium station? Or take a Metro bus up to the stadium?

Response P256-5 In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Section 2.0, Project Description, for a discussion of the proposed Project alignment, which would commence adjacent to LAUS and El Pueblo and terminate at Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Accordingly, the proposed Project would include three stations. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P256-6 5) Although the promoters tout the fare amount as less than driving into the stadium, most people go with their friends and family. If they're driving, they can share the parking cost. If they're taking the Gondola, they would each have to pay the fare! In addition, most people will drive to Union Station where they would pay the $6 parking fee. This practice would not "add up" and would not save vehicle emissions. If they take public transportation to Union Station, that would be an additional cost. If it's a night game, will Metro keep all of their lines running late to accommodate the Gondola fans?

Response P256-6 The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report,

Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. The Project Sponsor would coordinate potential improvements to late night service with Metro, Metrolink, and other transit service providers.

Comment P256-7 6) I was once at the Palm Springs tram and I went back down to the station while a friend I came with stayed at the top a little longer. Well, she and her toddler son got on the tram and, about half-way down, it stopped. It turns out the brakes failed and they had to stop it for repairs. They hung there in a crowded car for as long as it took for the needed parts to be picked up and flown to the top in a helicopter and the repairs made. What emergency plans will this project have in case of a mechanical failure? Will there be a means of evacuating the passengers or will they have to hang there indefinitely?

Response P256-7 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is unlikely to become inoperable due to a system malfunction given the system's design redundancies, regular maintenance, and backup battery power. The Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. The plan would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. The plan would also address the unlikely scenario where the system cannot be moved to unload passengers normally at stations. The robust design, periodic and preventative maintenance, and equipment redundancies are intended to minimize this scenario. However, the plan would include procedures to evacuate passengers directly from cabins, if needed.

Comment P256-8 I believe this project was conceived not as a convenience for fans or a benefit for the city, but as a money-making venture for the McCourts and the others who have joined them. This project is not a good idea and will not benefit the people of Los Angeles. Please register my objection to the Gondola Project.

Response P256-8 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and

accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P257 – Mary Livesay

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P257

Comment P257-1 My name is Mary Livesay and I work in downtown Los Angeles and I am writing to voice my strong opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

My concerns are surrounding lack of transparency and the increased traffic that will result from this project.

Response P257-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel.

Comment P257-2 From my understanding, Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project?

Response P257-2 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P257-3 The other thing that worries me about the Gondola Project is the increase traffic that will occur around Chinatown and Union Station. As someone who commutes to downtown LA and walks from Union Station to work I already experience the high-volume of traffic and sometimes erratic and unsafe driving that results from this traffic. Increased traffic will pose a greater danger to pedestrians and make LA and even more unfriendly city to those who walk since project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities.

Thank you for your consideration of my comments,

Mary Livesay

Claremont Resident

Los Angeles commuter and worker

Response P257-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around

Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment Letter P258 – Kaitlyn Brine

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P258

Comment P258-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). My name is Kaitlyn Brine and I work in the community in which the gondola project would affect. I am originally from Boston, Massachusetts and since moving to Los Angeles I am constantly overwhelmed by the amount of environmental injustice I witness. This gondola project would further emit pollution into an already environmentally unsafe area and would most affect those at the margins.

Response P258-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter P259 – Ricky de Laveaga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P259

Comment P259-1 Am I able to submit written comments on the Aerial Rapid Transit Technology LLC proposal (gondola) here? If so I would like to say:

As a longtime resident of Elysian Heights I am against this proposal with every fiber of my being.

Response P259-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P259-2 Not only will it displace a significant portion of our community, but it will accelerate gentrification and destroy the character of our neighborhood.

Response P259-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. The proposed Project also will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P259-3 Further, there will be a devastating impact to the area, significantly altering historic view sheds at Union Station and El Pueblo. New stations, towers, wires, and gondolas will result in a major change to this overall area of the city.

Response P259-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to Los Angeles Union Station (LAUS) and El Pueblo, which would be less than significant. Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, LAUS was designed in response to its proximity to El Pueblo de Los Angeles. As such, one aspect of LAUS' setting that is important is its axial connection and visual relationship with the Los Angeles Plaza Historic District. The proposed Alameda Station would be located over 100 feet north of the main axis—at the intersection of Los Angeles Street

and Alameda Street—between LAUS and the Los Angeles Plaza Historic District. The location is sufficiently offset so it would not interrupt the physical and visual relationship between the two historical resources. This important aspect of the LAUS' setting would be maintained.

Comment P259-4 I have not spoken to a single neighbor, civic expert, or local leader in favor of the project. This is bad money looking to swindle taxpayers and leave us as collateral damage.

Response P259-4 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financial Analysis, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P260

This comment number has intentionally been skipped.

Comment Letter P261 – Rahul Gunasekaran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P261

Comment P261-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P261-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P262 – Holly Harper

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P262

Comment P262-1 Respectfully, I most *strongly *oppose the LAART gondola project.

Response P262-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P262-2 The most immediate bad outcome for implementing this project is that it will carve-out and occupy *public space* at both el Pueblo de Los Angeles Historic Monument and the Los Angeles State Historic Park for what will ultimately be *private *gain. We don't have open, green space to spare in Chinatown and these two stations will also loom large in the background of both the 1818 Avila Adobe and the State Park.

Response P262-2 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. As discussed in Section 3.16, Park and Recreational Facilities, the construction and operational impacts of the proposed Project would result in less than significant impacts to El Pueblo and the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown,

and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Also refer to Section 3.5.4, Environmental Impacts, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe and The Winery), the El Grito mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P262-3 Neither do I view it in any way as a positive addition to the Union Station Forecourt and Promenade project currently under development, as part of the Connect US plan. Even in its latest watered-down iteration, this proposal makes a *start *at rebalancing the use of this area and connection to el Pueblo away from its prioritization of motorized vehicles and toward all of the rest of us on foot, bicycle of taking transit.

Response P262-3 As discussed in Section 2.0, Project Description, of the Draft EIR, Metro's LAUS Forecourt and Esplanade Improvements Project is currently being developed in coordination with the City of Los Angeles, and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. In addition, the Project proposes a new pedestrian plaza north of the Placita de Dolores in an area currently used as a parking and loading area for El Pueblo. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of how the proposed Project's Alameda Station location was also selected because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access, and because the location is compatible with Metro's plans at LAUS, including the LAUS Forecourt and Esplanade Improvements Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Further, as discussed in Section 5.0, Corrections and Additions, of the Final EIR, the mobility hub at the Dodger Stadium property would provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile

multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The proposed Project cabins would allow for sitting and standing as well as bicycles.

Comment P262-4 Finally: haven't the residents and neighborhoods in the canyons around Dodger Stadium suffered *enough *over the past six or seven decades from the oppressive presence of the Dodgers? McCourt is only the latest in a string of developers in control of all or part of the huge site of the Stadium, its parking lots and the vast potential embodied there.

Response P262-4 Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P262-5 Again, I'd ask why *one square inch* of the public spaces paid for and maintained by taxpayers should be sacrificed to support this theme park-like gimmick or McCourt's dreams of profiting massively from the redevelopment of the Stadium's parking lots? Once again Metro seems to be distracted by the latest shiny object, away from paying attention to the needs or desires of we peons traveling on foot, bike or bus.

Thank you for your time and attention.

Response P262-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P263 – Carey Bennett

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P263

Comment P263-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I live in LA and work a full time job that doesn't pay enough for me to afford a car. I take LA metro bus and train 5 days a week as part of my commute. The experience is disgusting, unreliable, inefficient and unsanitary. We need funding to make the LA metro experience less miserable and more reliable - so why not use funds that *could* go into a tourist trap gondola that will disrupt the communities it would run through and instead use it to put a dent in the hideous current situation that is the LA Metro?

Response P263-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financial Analysis, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses, and how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment Letter P264 – Hayk Makhmuryan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P264

Comment P264-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

From gentrification to environmental impact, this project will be absolutely devastating to Chinatown, LA State Historic Park and the surrounding neighborhoods.

Response P264-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts including to Chinatown, Los Angeles State Historic Park, and the surrounding neighborhoods. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P264-2 As an arts and cultural worker and organizer in downtown LA since 2008, I've been both an attendee and a facilitator at the State Historic Park many many times, and the experience of the park would be completely impoverished by the presence of this project.

Response P264-2 Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including

pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment P264-3 As a tenants rights organizer since 2017, I can attest that this project, even if well intentioned will push out and destroy the lives of thousands of most vulnerable locals with callous predictability.

Response P264-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. The proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Response P264-4 for discussion of how the Draft EIR addresses environmental justice and supports Metro's goal of prioritizing equity opportunities.

Comment P264-4 Please do not invest in a project that is a toy of the rich at the cost of hurting the average resident, the poor, and the local neighborhoods.

I'm an avid user of public transportation and I appreciate very much all the transit projects improve the lives of residents across the board (like improvement in bus lines and operation); this Gondola project is not one of them.

Response P264-4 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, as discussed therein, the public outreach for the proposed Project was designed with environmental justice principles in mind. And, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment Letter P265 – Freda Shen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P265

Comment P265-1 I am stating my opposition to the creation of this aerial gondola that would link Union Station and Dodger Stadium at Chinatown's expense.

This is as bad as the proposed aerial tram from Warner Brothers to the Hollywood Sign that would have been at the expense of the City's urban wilderness, Griffith Park.

Both proposals belong in the trash heap of ill-conceived ideas.

Response P265-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P265-2 This Dodger Stadium proposal was given unusual no-bid fast tracking after being proposed by Frank McCourt in 2018.

Response P265-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P265-3 The traffic and environmental claims made by this proposal have been strongly challenged by data from the Sierra Club, by UCLA's Mobility Lab, by LA River State Park Partners, and by UCLA's Institute of Environment and Sustainability.

Response P265-3 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Responses GO21, PH172, and PH283 and for responses to Los Angeles River State Park Partners. Refer to Response GO12 for responses to the Sierra Club. Refer to Responses GO24 and PH204 for responses to Jon Christensen.

Comment P265-4 Instead of this tram literally hanging over the community, a better option would be dedicated bus lanes for the existing Dodger Express, a shuttle service from Union Station to Dodger Stadium run by LA Metro.

Response P265-4 Refer to Section 4.0, Alternatives, of the Draft EIR and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of the proposed Project. The Transportation Systems Management Alternative otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P265-5 The community that would be affected - Chinatown, Lincoln Heights and Solano Canyon - has spoken up vehemently against the tram, most recently at a public meeting on 1/12/2023 that allowed for no public comment, so that the community was forced to take over the meeting in order to have their concerns and protests heard.

Please listen to the community and discard this proposal.

Response P265-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling

(213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, including the January 12, 2023, public hearing discussed in this comment, comments on the Draft EIR could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments received at this continued public hearing were deemed timely received for the purposes of the Draft EIR public review period.

Comment Letter P266 – Zach

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P266

Comment P266-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P266-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P267 – The Burgard Family

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P267

Comment P267-1 Please accept this email as our strong opposition to the proposed gondola project terminating at Dodger Stadium.

Response P267-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P267-2 The cost/benefit and public use projections are unrealistic and the damage to Chinatown's cultural identity would be immeasurable.

Thank you for your consideration,

The Burgard family

Response P267-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups

to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Comment Letter P268 – Sara Z Mijares

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P268

Comment P268-1 I would lo speak with you about the Gondola Airail project.

I have been a DRAC member for Metro for a few years, participated as a CBO member in the Eastside Corridor Metro Project and we are starting a small contract as a CBO for the LA Transit Traffic Reduction Project.

Please let me know what day and times are convenient for you. This is my cell phone. 562 505 6023. I am out of town until January 23 and there is a 3 hour time difference from California, we are 3 hours ahead of you.

Response P268-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P269 – Ezra Muthiah

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P269

Comment P269-1 I am a Los Angeles resident writing in to urge you to halt all plans for building the gondola. I was born and raised in LA County and have been taking Metro to school, work, and recreationally since I was 12. I love Metro and I am passionate about expanding access to public transportation in LA. But this gondola project is not that.

Response P269-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P269-2 Research has shown that it will do nothing to help ease traffic. Instead, the gondola simply displaces the burden of Dodger's Stadium parking onto poorer communities who are not asking for this gondola and who will not benefit from it. In line with it changing traffic in the surrounding area by less than one percent, it also does nothing to curb greenhouse gas emissions. We want shuttles, not expensive gimmicks!

Response P269-2 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft

EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Refer to Section 4.0, Alternatives, of the Draft EIR and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Moreover, the TSM Alternative is not a permanent transit connection as bus routes, and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the

unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P269-3 Despite financial backing from Frank McCourt, there has been a pattern of projects like these inevitably footing taxpayers with the bill. Taxpayers can especially expect our money to be wasted because there has been zero transparency about long-term operation costs and who ends up paying if/when the project runs over budget. I hope that my personal stake in this is not lost in these more technical talking points. I love this city, I love Metro, I love the Dodger's. I want what's best for all of us, and this gondola just isn't it. I hope you take this into consideration and recognize what this city needs, and what it doesn't need.

Response P269-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project, and Section 4.0 Costs and Financial Analysis, of the Final EIR, which provide detail as to the proposed project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P270 – Tom Zhang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P270

Comment P270-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I worked to serve Chinatown residents with the Chinatown Service Center vaccine clinic in 2021. As someone who has a deep appreciation for the neighborhood and also has an understanding of the history of forced displacement and marginalization of the LA Chinese American community, I am deeply troubled by the plans to build the Gondola Project in and around Chinatown. Union Station was likewise a project that was built at the expense of the LA Chinese population - it rests on the bones of old LA Chinatown and its inhabitants. This Gondola Project doesn't even have the potential to benefit the residents of LA nearly as much as Union Station, and yet it is for some reason being seriously considered, despite the outsized impact it will have on the residents of neighborhoods like Chinatown, which is already facing gentrification, air pollution, and heavy traffic.

Response P270-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, and how the proposed Project would address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets,

arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P270-2 The idea of building a gondola is not just outdated, it is also a horribly inefficient method of transit - ferrying something like 16 people a cabin (if that). A far better use of the funds needed to construct an air gondola system would be to simply invest in more existing public transit systems - dedicated bus lanes and more metro lines.

Response P270-2 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. As in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between Los Angeles Union Station (LAUS) and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. In addition, Topical Response H discusses how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P270-3 This project will cause environmental damage, increase gentrifying pressures on Chinatown, and add an eyesore to the LA skyline, all in exchange for a negligible reduction in traffic at Dodger Stadium. Again, the solution should be methods like

metro lines, bus lanes, and improving pedestrian/bike accessibility. All the Gondola Project will due is harm an already beleaguered population in LA's Chinatown and the surrounding areas.

Response P270-3 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to

meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. In addition, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P271 – Tiff H.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P271

Comment P271-1 Hi Mr. Zelmer, I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I grew up in Chinatown in the 90's and have seen the gentrification and changes to the neighborhood over the years. The impact of some of these developments have a devastating impact on residents due to corporate greed. Grocery stores that were once convenient to residents, have closed. Gone are the days of mom and pop shops inside tiny stalls that boast a lively neighborhood that drew both locals and tourists alike.

Response P271-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses to drive customers to Chinatown's small businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation represents an opportunity for additional visitors along the proposed Project alignment.

Comment P271-2 Many residents are elderly immigrants that don't speak any english nor possess the necessary tools to communicate their opposition to this project. The lack of transparency with the community has shown that there was no intent to invite any true discussion with the residents.

Response P271-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach

meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P271-3 We should use the funding for better existing transit options for everyone. As we all know, Los Angeles is currently under a state of emergency over the homeless crisis. How about we try to solve a more dire need before we provide luxury transit for visitors? Most Angelenos, including myself, would agree.

Response P271-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment Letter P272 – Jacqueline Pabst

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P272

Comment P272-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P272-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P273 – David Shorter

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P273

Comment P273-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P273-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P273-2 I am an UCLA professor who works with various communities pertaining to land stewardship and community health. While I personally would be impacted very little, I am writing you because many community members are disempowered by the project and even by the process by which to voice their opposition to the project. On behalf of those who work over sixty hours a week, those who are not privileged with technology, or who might not feel worthy of being heard in official capacities, I write in opposition to the Gondola.

Response P273-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown/State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on

Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. The Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P273-3 The Gondola was a vanity project dressed up as a public good where the public served is not the communities negatively impacted by the literal change to their urban environment.

Thank you for paying attention to the calls of the impacted communities.

Response P273-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P274 – Grace Doyle

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P274

Comment P274-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I cannot believe the audacity of this proposal. It's not transit. It's for tourists.

Response P274-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P274-2 And who exactly is paying for it? Even if it's privately funded, it's using a public resource- the historic park. The nature of which will be completely changed when there are massive metal cars dangling above head.

Response P274-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed

Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P274-3 That is not what parks are for. Where have the public commenting opportunities been? Where is the reach out to the community? All I've seen is propaganda in the form of a car displayed in the dodgers parking lot with no mention of any of the concerns opponents have. Just an advertisement as if the gondola is destiny. Stop the corruption. Build transit for the people.

Response P274-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment Letter P275 – Bryan Bosque

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P275

Comment P275-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P275-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P276 – Kim Reyes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P276

Comment P276-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P276-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P277 – Nick Scottrussell

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P277

Comment P277-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

How is this benefitting the public?

Response P277-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer also to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P277-2 I know that it's gentrifying Chinatown which hurts a historically oppressed population. I know it's money that won't be going towards building new train lines or making

busses free. Who is paying for this ski lift? Tax payers? Even if it's privately funded, it's using public resources. This project is an obvious "no". A perfect picture of corruption that's run rampant in LA politics for far too long.

Response P277-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. The proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Response P277-1 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P278 – Liliana Cortez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P278

Comment P278-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P278-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P279 – Jaime Zavala

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P279

Comment P279-1 I am writing to tell you I don't want this Gondola project to go through. What is the point of an aerial gondola that services a specific subset of people going from Union Station to Dodger's stadium? What does that do to solve our traffic congestion?

Response P279-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P279-2 How is this conducive to getting more single rider vehicles off the road? How is this lowering emissions? Why aren't you using OUR resources to fund forms of public transit around the city that actually benefit all Los Angelinos? Do not go through with this. It is not worth the displacement of people in the gondola's planned path. It is not worth the potential rent increases to surrounding neighborhoods.

Response P279-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed

Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P279-3 I love riding the LA metro bus lines and the new expanded rail lines around the city. Those are a way forward in public transit that stand to benefit everyone. Not a specialized gondola to a sports stadium.

Response P279-3 Refer to Response P279-1 for discussion of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P280 – Kassandra Zepeda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P280

Comment P280-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

As a resident of the solano community, I will be impacted by this project. I am concerned about this project for the following reasons:

Response P280-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P280-2 through P280-4.

Comment P280-2 -This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions. My son and I already suffer from asthma caused by the pollution already surrounding us , we try our best to keep ourselves as healthy and safe as possible and building the gondola would only impact me and my 5 year olds health even more.

Response P280-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P280-3 -This project will lead to displacement and increase the cost of rent in the area. I am trying to raise my family as best I can . I live with my husband and 2 children , we are BARELY surviving and making ends meet and to pay rent . This would greatly impact our lives with rent increases , can you imagine the drastic sudden changes we would need to do to survive and keep our children healthy and safe. I am sure this is not something YOU would be happy having to do let alone the unnecessary stress this will cause not only to my children but my children's friends who all live within the neighborhood.

Response P280-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed

Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P280-4 -Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community. You are shutting our voices down and closing us out, when we as a community have been keeping this place safe and clean for all the families and children living here. This is will NOT benefit anyone here Instead it will affect all of us. I am sure you would be very unhappy if this was happening near your home without ever caring about what you had to say about it and without your consent. This unfair to our children they DO NOT DESERVE THIS

Response P280-4 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and

open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment Letter P281 – Dennis Rohatyn

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P281

Comment P281-1 A gondola from Union Station to Dodger Stadium makes about as much sense as a ski lift in the Amazon, or a snowmobile in the Sahara. This is Chinatown, Frank. You can't ignore, let alone, leap-frog over it. One must respect both its presence and its inhabitants, while protecting them from serious problems that any aerial transportation system would surely encounter, be it a snapped cable, an earthquake, a short-circuit, a computer glitch, or mechanical malfunctions that would endanger the lives of passengers, motorists and residents, simultaneously. As it stands, the plan is an invitation to disaster, and a major accident waiting to happen.

Response P281-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR for discussion of how the structural design of the proposed Project's stations, junction, and towers would meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety, and the proposed Project would adhere to its Emergency Operations Plan which would include emergency response protocols and state that in the event of a major earthquake the system would be fully evacuated and shut down, and would not operate.

Comment P281-2 It is also bound to be expensive and far from cost-effective, hence not worth the risk. If only Vin Scully were alive, he'd explain why, in ways that even City Hall might grasp.

Response P281-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P281-3 Listen in: "Frank McCourt has tremendous local power, especially in the alleys adjacent to freeway traffic. . . waiting for the 1-1 switch: Karen Bass lifts a high ride, deep to downtown—she is going, going, gondola." Once again, it's time for political hardball—but why dodger a flying bullet? Or are we still in Chinatown, after all?

Response P281-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P282 – Suellen Wagner

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P282

Comment P282-1 To Whom It may concern:I oppose the Los AngelesAerial Rapid Transit Project, due to severe negative impacts on the communities that will be "overflown" at low altitude by the gondolas. These communities are being disregarded, indeed sacrificed, for the purpose of yet another gondola tourist attraction. It won't work in Griffith Park and it won't work here, without imposing harsh impacts on citizens that have little to no defense against the City of Los Angeles, LA Metro, and the unaffected populace.

Response P282-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition,

the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, as discussed therein, the public outreach for the proposed Project was designed with environmental justice principles in mind. And, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment P282-2 This proposed project will not meet the objectives of the project, i.e. reducing traffic by becoming a mobility hub. There are easier, faster, and better ways to meet the objectives, such as making better use of existing bus lanes.In addition, what is a mobility hub? Will this new hub have other purposes, for other modalities such as Advanced Air Mobility/Urban Air Mobility?

Response P282-2 As described in Section 2.0, Project Description, of the Draft EIR, the proposed Project is an aerial gondola system that would provide a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Aerial rapid transit technology is a proven, zero emission, safe, sustainable, high-capacity and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.8, Project Objectives, of the Draft EIR, for discussion of the Project Objectives which broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Urban Air Mobility is not under consideration for these mobility hubs.

Comment P282-3 Will such, extremely impactful, deleterious uses be stacked onto the hub, leading to impacts that are unforeseen by the community, who is left out of decision making, but in the already in the works by LA's policymakers and leaders?As a community activist in Studio City, I have seen continually that citizens are continually ignored when it comes to development, on City, State and Federal levels, and are shut out of the process -- their requests for information about safety, environmental impacts, and costs are eft unanswered. This must change.Find a better way to get people to Dodger Stadium. There is no need to work around the Developer/Owner's desire to expand his facilities. For once, listen to common sense -- which is not coming from Metro, but rather the affected communities.STOP THE GONDOLA!Sincerely,Suellen WagnerStudio City, CA 91604Save Coldwater Canyon

Response P282-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P282-2 for discussion of the proposed Project's mobility hubs. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P283 – Ric Romero

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P283

Comment P283-1 I have lived in the community of Solano Canyon for 48 years, and have noticed a lot more traffic, events and parking issues around our local community with the Dodger organization. And with no warning or deal with it type business mentality that has affect the community with parking, carbon foot print, and no benefits to the local community. Dodger organization has benefited from events and expansion, but has no regards with the community.

Response P283-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P283-2 We have voiced our concerns with previous events and falls on deaf ears. Feels like when people got displaced in the 50s and had no voice for the working community of palo verde and Chavez Ravine.

Response P283-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P283-3 Building this gondola doesn't resolve traffic it increases it. Makes. A bigger issue with Carbon foot print, parking issues due to people want to park in the community because it's free vs. parking at the state park because they charge.

Response P283-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N,

Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P283-4 The local view of the skyline to downtown gets disrupted by a monstrous towers, cables and gondolas. Metro has created more traffic on streets than lessen the impact for traffic, such a bus lanes. This will be another issue for the local Bishop, China town, and area where there will be a stop for the gondola.

Please do not move forward with the gondola.

Response P283-4 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to the Los Angeles State Historic Park, which would be less than significant. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the

proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions.

Refer to Section 4.0, Alternatives, of the Draft EIR and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment Letter P284 – Sara Z Mijares

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P284

Comment P284-1 I would like to speak with you regarding the Aerial Gondola project.

I have been reading some of the news reports and different quotes of groups, people, orgs, etc. that are against this project.

Since the comment period is due in two days and one of them is a holiday, I would really like to exchange some ideas with you before sending an official comment.

In early September 2022 I was in Bolivia doing some cultural/entrepreneurial training work for indigenous communities and I loved the aerial transportation that they have and I thought "this would be a wonderful way of cutting down dome traffic in LA" not knowing that this project has been in existence. However, as a DRAC Metro member, I know first hand that if community feedback is not secured from the beginning the backlash is harsh.

Please get back to me at 562 505 6023.

Thank you.

Response P284-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment Letter P285 – Brad Bain

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P285

Comment P285-1 I live at 3036 Atwater Ave, Los Angeles CA 90039 -- close to both Union Station, Elysian Park, and Dodgers Stadium.

I absolutely support this project, and support the Draft EIR. This will be so helpful to so many people and further encourage the crowds to take transit to Dodgers Stadium, which is currently a giant parking lot choked by car traffic

Response P285-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P286 - Xulan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P286

Comment P286-1 Dear city government, city councillors, and relevant persons in charge:

Oppose billionaire and former Dodgers owner Frank McCourt to build a gondola that takes people from Union Station to Dodger Stadium!

Response P286-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P286-2 This is a waste of taxpayers' money to serve the interests of entertainers and to endanger the safety of residents of the Chinatown neighborhood by having gondolas shuttling back and forth over their homes in an extremely dangerous manner.

Response P286-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P286-3 I hope that the city government, city councillors and the deputy executive Officer of the Los Angeles County Metropolitan Transportation Authority will solve the current primary problem by building $125 million in apartments for the elderly, homeless and low-income people, as well as building 24-hour emergency hospitals and inpatient department, large supermarkets, public restrooms, and a more convenient, more practical and better environment for the Chinese community to live and work in!

Thank you!

Response P286-3 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself

address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment Letter P287 – Dale Brandenburg

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P287

Comment P287-1 Private investments for this project would be acceptable to me but strongly feel that no public funds should be used until we address the homeless problem and lack of low cost housing in Los Angeles.

Response P287-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing in the surrounding communities.

Comment Letter P288 – Crystal Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P288

Comment P288-1 I think it's a great idea less traffic. More parking.

Response P288-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P289 – Geri Foyle

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P289

Comment P289-1 I think the gondola is a great idea. I am a senior citizen and would use it to go to the stadium.

Response P289-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P290 – Martin Campos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P290

Comment P290-1 I support the L.A. Aerial Rapid transit project

Response P290-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P291 – Elizabeth Usruitia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P291

Comment P291-1 I support the Gondola since many people have disabilities and this will make it easier for them to visit the stadium

Response P291-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P292 – Danielle Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P292

Comment P292-1 I think it's a great idea for the Gondola to be built because of traffic.

Response P292-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P293 – Iris J Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P293

Comment P293-1 I agree the gondola is a great idea. I truly agree with this.

In fact are they hiring I would love to be part of the team.

Response P293-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P294 – Jade Castillo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P294

Comment P294-1 I support the Gondola and I think it's benifical to people with no car and to people that are disabled.

Response P294-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P295 – David Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P295

Comment P295-1 I support the Gondola to help control traffic since it is bad along Sunset heading to the games.

Response P295-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P296 – Enrique Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P296

Comment P296-1 I think its an amazing idea to get the Gondola so it can decrease the traffic during the Dodger games

Response P296-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P297 – Norma Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P297

Comment P297-1 I support the Gondola Project especially as it will help control all the heavy traffic in the area while the Dodgers are playing.

Response P297-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P298 – Maria

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P298

Comment P298-1 I support the Gondola since it is going to help with parking at the Dodger game and it take only seven minutes

Response P298-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P299 – Guadalupe Rabadau

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P299

Comment P299-1 I support the Gondola Project as it will lessen all the traffic in the area especially during the Dodger games.

Response P299-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P300 – Alejandro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P300

Comment P300-1 The Gondola will help with the time it will take to get to Dodger stadium that is why I support this project

Response P300-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P301 – Bertha Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P301

Comment P301-1 I support the Gondola since it was help with the traffic in the Area

Response P301-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P302 – Noelo Heese

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P302

Comment P302-1 The Gondola will be good as it will help with the traffic to Dodger stadium

Response P302-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P303 – Kimberly Drenas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P303

Comment P303-1 I support the Gondola due to the transportation problem we have here in California going to sporting events

Response P303-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P304 – Andrew Inema

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P304

Comment P304-1 I support the Gondola since it would only take 7 minutes to get to Dodger Stadium and eliminate a lot of cars at the stadium

Response P304-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P305 – Tina Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P305

Comment P305-1 The Gondola sounds like a great idea so we can have less congestion while going to and from the Dodger games

Response P305-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P306 – Manuel Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P306

Comment P306-1 I like the idea of not driving to the games and just relaxing in the Gondola "whataview"

Response P306-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P307 – Arleen Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P307

Comment P307-1 We needed something like the Gondola years ago to help with all the traffic going to Dodger games "Great Idea"

Response P307-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P308 – Jose Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P308

Comment P308-1 I agree with the construction of the Gondola to help with all the traff going to the games

Response P308-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P309 – Diane Brown

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P309

Comment P309-1 The idea of a new way to travel to the Dodger games is a great idea

Response P309-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P310 – Helen Hurtado

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P310

Comment P310-1 I am a senior and will be glad to see and ride the gondola in my lifetime

Response P310-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P311 – Aleena Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P311

Comment P311-1 I was so happy to hear there is a new way to get to Dodger Stadium

Response P311-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P312 – Jorge Hurtado

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P312

Comment P312-1 I like the idea of the Gondola

Response P312-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P313 – Rachel Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P313

Comment P313-1 I support the Gondola because it will help for us to get to the games in less time without so much traffic

Response P313-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P314 – Monica Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P314

Comment P314-1 This is a godsent to all the people who live by Dodger Stadium

Response P314-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P315 – Mary Jo Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P315

Comment P315-1 What a great convenience why did it not happen sooner

"I support this"

Response P315-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P316 – Danny Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P316

Comment P316-1 The Gondola is a good idea for all who attend the games at Dodger Stadium we will be able to get home sooner without waiting for all the traffic

Response P316-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P317 – Yolanda Garza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P317

Comment P317-1 Very interesting concept. Would like to see this happen.

Response P317-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P318 – Monique Bracamontes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P318

Comment P318-1 I love the idea of the gondola

Response P318-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P319 – Eric Bracamontes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P319

Comment P319-1 The Gondola would be good to go in and out of the stadium since to get out at the end of the game, and it even better since its free.

Response P319-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P320 – Anel Becerra

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P320

Comment P320-1 I support the Gondola since it would help with traffic on the streets going to Dodger Stadium.

Response P320-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P321 – Arturo Ortiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P321

Comment P321-1 I support the Gondola for all the changes that it would bring to our city

Response P321-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P322 – Eleda de Anda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P322

Comment P322-1 I support the gondola, I believe it will be good for the community

Response P322-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P323 – Jennie Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P323

Comment P323-1 I'm a dodger fan, and will like to be able to take the gondola to go to the games

Response P323-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P324 – Brian Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P324

Comment P324-1 I will support the gondola, I don't drive and it will be nice to go see a Dodger game

Response P324-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P325 – Emma Aguila

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P325

Comment P325-1 Im a senor citizen and would like to go to a Dodgers Stadium on the gondola

Response P325-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P326 – Jason Seguda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P326

Comment P326-1 Driving all week long for work it will be nice to take the gondola to go see a game at Dodgers Stadium

Response P326-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P327 – Patuel Montanez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P327

Comment P327-1 What a great idea great for the community

Response P327-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P328 – Vincent Ruilla

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P328

Comment P328-1 I SUPPORT THE GONDOLA, TO ELEVATE TRAFFIC

Response P328-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P329 – Martha Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P329

Comment P329-1 The gondola will help handy cap people.

Response P329-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P330 – Adam Reeves

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P330

Comment P330-1 A 7 min trip instead of a 30 min one sign me up!

Response P330-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P331 – Martha Contreras

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P331

Comment P331-1 The gondola is a good project for new transportation in our city.

Response P331-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P332 – Rupert Jones

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P332

Comment P332-1 I support the construction of the gondola.

Response P332-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P333 - Imelda Morales

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P333

Comment P333-1 Let's approve this project and build the gondola for all Los Angeles

Response P333-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P334 – Fatima Lopez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P334

Comment P334-1 I support the gondola

Response P334-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P335 – Javon Newman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P335

Comment P335-1 Support this project lets build it right away!

Response P335-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P336 – Alexander Black

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P336

Comment P336-1 Great project for the community

Response P336-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P337 – Linda Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P337

Comment P337-1 LA ART supports my community I support them build the gondola

Response P337-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P338 – Amy Matthews

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P338

Comment P338-1 I support the Gondola

Response P338-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P339 – Jesus Villanueva

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P339

Comment P339-1 Hopefully open before the olympics

Response P339-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P340 – Clarissa Paredez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P340

Comment P340-1 Build the air cars ASAP!!

Response P340-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P341– Simon Lopez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P341

Comment P341-1 This project would provide transportation from Union Station to Dodgers Stadium it is a wonderful Idea.

Response P341-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P342 – Spencer Rites

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P342

Comment P342-1 Hopefully this cleans up city traffic

Response P342-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P343 – Kaylee Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P343

Comment P343-1 The sooner this is built the better

Response P343-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P344 – Robert Slack

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P344

Comment P344-1 We want less traffic I support the Dodger gondola

Response P344-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P345 - Juliette Lopez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P345

Comment P345-1 I support the project

Response P345-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P346 - Justine Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P346

Comment P346-1 The gondola will make less pollution and make it healthier for neighbors.

Response P346-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P347 – Jason Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P347

Comment P347-1 I support the dodgers gondola

Response P347-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P348 – Marissa Cortes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P348

Comment P348-1 We want more zero emission transportation.

Response P348-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P349 – Lesley Gomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P349

Comment P349-1 The gondola could remove 3,000 cars during the game, it's a great idea.

Response P349-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P350 – Cindy Maciel

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P350

Comment P350-1 It will help with traffic and clean up the air. I support it.

Response P350-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P351 – Destiny Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P351

Comment P351-1 My neighborhood had bad traffic, this will clean it up.

Response P351-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P352 – Amber Cervantes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P352

Comment P352-1 LA ART will move 5000 people up and down the mountain every hour. I support it.

Response P352-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P353 – Callie Liley

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P353

Comment P353-1 The gondola would be seven minutes from downtown to Dodgers Stadium. I support the Dodgers Stadium gondola.

Response P353-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P354 - Mariposa Jimenez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P354

Comment P354-1 1. This project is miraculous.

Response P354-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P355 - Victor Balderrama

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P355

Comment P355-1 1. A great community support.

Response P355-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P356 – Leticia Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P356

Comment P356-1 I support the Gondola because I think it would be a good means of transportation to get quickly to the Dodgers Stadium and reduce traffic.

I support the gondola because I believe that it will be a good idea for transportation to reduce traffic and gas money.

Response P356-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P357 – Raymond Noriega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P357

Comment P357-1 I support the Gondola since back in the days traffic on broadway was bad and is still bad. I grew up in Lincoln Hts.

Response P357-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P358 – Leslie Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P358

Comment P358-1 I agree with the Gondola, because I struggle with transportation. So the Gondola will be a great alternative of transportation and not have to deal with traffic.

Response P358-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P359 – Angela Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P359

Comment P359-1 I support the Gondola since I feel it will be less traffic to get to the dodgers stadium.

Response P359-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P360 – Celeste Revills

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P360

Comment P360-1 I look for to the Gondola for 2 reasons.

Parking Lot Chaos there will less traffic when leaving the park.

Convenience when traveling alone you have convenience of using different means of transportation.

Response P360-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P361 – Efrain Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P361

Comment P361-1 I support the Gandola.

I can’t wait to use the Gandola to commute to the Dodgers Stadium.

Response P361-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P362 – Gustavo Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P362

Comment P362-1 I support the Gandola.

Finally modernizing the transportation.

Response P362-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P363 – Maria Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P363

Comment P363-1 I support the Gandola.

Watching the view from the gandola.

The view of the Dodgers Stadium.

Response P363-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P364 – Tanya Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P364

Comment P364-1 I support the Gandola.

I can’t wait to ride the Gandola.

Response P364-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P365 – Carlos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P365

Comment P365-1 I like the idea because it will not cause more smog. for that reason alone I will support the gondola project.

Response P365-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P366 – Carlos Aguirre

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P366

Comment P366-1 I believe it will put us up there! So, yes I support it.

Response P366-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P367 – Juan Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P367

Comment P367-1 They could view the ho city

I support it

Response P367-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P368 – Yvonne Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P368

Comment P368-1 I think its an amazing idea and convenient, and support it

Response P368-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P369 – Arson Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P369

Comment P369-1 Support the gondola.

Response P369-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P370 – Amy Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P370

Comment P370-1 Support the gondola.

Response P370-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P371 – Joanne Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P371

Comment P371-1 Support the gondola

Response P371-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P372 – Diana Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P372

Comment P372-1 [No comment provided.]

Response P372-1 No comment was provided. The comment letter form with signature will be provided to the decision makers for review and consideration.

Comment Letter P373 – Lyn Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P373

Comment P373-1 [No comment provided.]

Response P373-1 No comment was provided. The comment letter form with signature will be provided to the decision makers for review and consideration.

Comment Letter P374 – Marina Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P374

Comment P374-1 good

Response P374-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P375 – Lyn Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P375

Comment P375-1 good

Response P375-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P376 – Leo Lei

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P376

Comment P376-1 Support the gondola.

Response P376-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P377 – Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P377

Comment P377-1 Support the gondola.

Response P377-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P378 – Wu Ainne

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P378

Comment P378-1 Support the gondola.

Response P378-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P379 – S. Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P379

Comment P379-1 Support the gondola.

Response P379-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P380 – Angela Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P380

Comment P380-1 Support the gondola. Good idea, Good! Good!

Response P380-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P381 – Kelly

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P381

Comment P381-1 Support. SUPPORT

Response P381-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P382 – Cynthia Lu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P382

Comment P382-1 Support SUPPORT GONDOLA

Response P382-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P383 – Kenny Phu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P383

Comment P383-1 I SUPPORT GONDOLA

Response P383-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P384 – Bruce Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P384

Comment P384-1 Support Gondla

Response P384-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P385 – Elaine Cao

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P385

Comment P385-1 Support the gondola.

Response P385-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P386 – Xiu Wei Deng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P386

Comment P386-1 Support the gondola.

Response P386-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P387 – Lily

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P387

Comment P387-1 Support the gondola.

Response P387-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P388 – C K Ko

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P388

Comment P388-1 Support the gondola, bring benefits to people

Response P388-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P389 – Qingxia Cen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P389

Comment P389-1 Support the gondola.

Response P389-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P390 - Yiyan Situ

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P390

Comment P390-1 Support the gondola.

Response P390-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P391 - Su Chan Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P391

Comment P391-1 Support the gondola.

Response P391-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P392 - Wai Li Kuan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P392

Comment P392-1 Support the gondola.

Response P392-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P393 - Bing Yang Situ

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P393

Comment P393-1 Support Gondola

Response P393-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P394 - Li Shao Xie

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P394

Comment P394-1 I strongly support the gondola transit. It will benefit people.

Response P394-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P395 - Xianen Bai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P395

Comment P395-1 I support the construction of the gondola. It will benefit people.

Response P395-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P396 - Lan Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P396

Comment P396-1 Support the gondola

Response P396-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P397 - Jie Tang Zhou

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P397

Comment P397-1 Support the gondola

Response P397-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P398 – Guohui Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P398

Comment P398-1 The earth needs to be protected. This electric gondola meets the need. It is powered by electricity, which will reduce pollution. Currently, traffic jam is a big problem to Dodger Stadium. It is a great suggestion to build the gondola at Dodger Stadium station, which will bring customers to businesses around. I highly support the construction of gondola. Hope it can be built soon.

Response P398-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses.

Comment Letter P399 - Rui Fang Feng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P399

Comment P399-1 I support LA Aerial Rapid Gondola Project. It can significantly reduce pollution and improve traffic. I hope it can be built quickly.

Response P399-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P399-2 Support aerial rapid transit project.

Reduce Pollution; reduce traffic

I hope it can make it fast

Response P399-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P400 – Daniel Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P400

Comment P400-1 Fantastic Idea defenetly will benefit the community and neighborhood.

Response P400-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P401 – Judy Abarca

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P401

Comment P401-1 I support the project because it will take 5,000 people per hour and it would be there in just 7 minutes. There won't be so much traffic like it is now, and it will be free for the residents of the area.

Response P401-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P402 – Teresa Villa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P402

Comment P402-1 I like the project because it's going to reduce a lot of traffic and I am not going to be stuck in it at just a few blocks from my home. Please approve it soon.

Response P402-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P403 – Ana C. Sorto

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P403

Comment P403-1 I support the Gondola Project because it is beneficial to all, especially because it will reduce traffic in my area and transportation to the stadium will be faster, just 7 minutes and it takes 30 to 40 people per gondola.

Response P403-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P404 – Maria Orozco

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P404

Comment P404-1 I support it because traffic will move faster.

Response P404-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P405 – Roberto Vucio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P405

Comment P405-1 It is a good idea for all, less traffic, a lot of business

Response P405-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P406 – Jose Flores

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P406

Comment P406-1 I support the Gondola Project because it is beneficial to us, especially in terms of traffic and transportation.

Response P406-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P407 – Rosaura Ulloa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P407

Comment P407-1 To me, it is a very good idea, there will be less traffic and everything will be better for businesses, there will be a lot of business, so it is a very good idea for all.

Response P407-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P408 – Guillermina Martinez Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P408

Comment P408-1 A very good option to reduce traffic and clean up the environment, because it does not pollute, it is also very quiet and it will take only 7 minutes to get there, while the bus departing from Union Station takes between 30 and 40 minutes to arrive there. Please approve it.

Response P408-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P409 – Trinidad Zesate

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P409

Comment P409-1 I love the project. I already want it to be ready to take my family for a ride. And I like even more the fact that it will be free for all the residents in the area.

Response P409-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P410 – Evangelina Zesate

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P410

Comment P410-1 I support the project, it is something I like a lot and it is free for us, the residents of the area, build it soon so I can take a ride.

Response P410-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P411 – Elizabeth Acevedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P411

Comment P411-1 I support this project because there will be less traffic in this area and people will be arriving faster to the stadium.

Response P411-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P412 – Jessica Suarez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P412

Comment P412-1 It is a very good idea to build the gondola so it can get people faster to their workplaces or wherever they want to go. There is a lot of traffic on the street. There won't be any smog with the gondola.

Response P412-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P413 – Reina Rodriguez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P413

Comment P413-1 The gondola can reduce 3,000 car rides, it can connect the public transit system, including the region and the bus lines, and it can make access to the park easier.

Response P413-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P414 - Maria Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P414

Comment P414-1 Very good project, I like the idea of the gondola a lot to make the city better and have cleaner air, very good progress.

Response P414-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P415 – Mariol Ojeda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P415

Comment P415-1 A great idea that would benefit all the surrounding community and the riders who are in transit or are going to work in the area, because it would reduce a lot of traffic, I already want to see this project and ride in it.

Response P415-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P416 - Maria Areola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P416

Comment P416-1 I support the project because traffic is going to be reduced, resulting in cleaner air and a better life. I have heard about this project for many years now, please start building it.

Response P416-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P417 – Alicia Ojeda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P417

Comment P417-1 I support it because there will be less traffic in the area, because whenever there are games played, it is impossible to get to our homes. We are no longer going to be stuck in the traffic. Please approve it.

Response P417-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P418 - Manina Huna

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P418

Comment P418-1 It is true, as shown in the Los Angeles Aerial Rapid Transit Project.

With this project, businesses will have more sales in general in each of the stations. Gondola rides will have panoramic views.

This will be amazing for many people. I personally have talked about it with my friends and they are really excited to have this project ready!

This trend shows positive growth.

Response P418-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P419 - Carifina Caro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P419

Comment P419-1 I support the gondola because it will reduce the number of parked cars in my neighborhood, there will be less traffic and air will be cleaner and pure. It will reduce traffic in the area and it will be free for the residents of the area.

Response P419-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P420 - Maria Mosqueda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P420

Comment P420-1 I support this project because it will benefit my community a lot. Currently, whenever games are played, we can't go anywhere because we just get stuck in traffic and then we can't find any parking; with this means of transportation, we expect that people take the bus, train or metro link to Union Station, and then the gondola, thus preventing them from parking in our neighborhood.

Response P420-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P421 – Barbara Da

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P421

Comment P421-1 Great, idea, gret process

Response P421-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P422 – Ricardo Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P422

Comment P422-1 It is a very good idea to build the gondola, so people can have faster and safer transportation, while reducing traffic in the street and smog…

Response P422-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P423 – Isabel Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P423

Comment P423-1 I support the gondola because we will commute faster; I suffer from stress and this will help me get to the stadium faster. Here, it is very difficult to find parking and this will help to prevent people from parking in our neighborhood. I rode the one in Chicago and I liked it a lot, I am telling you, approve it soon.

Response P423-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P424 – Jose Leja

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P424

Comment P424-1 I support the gondola.

Very good idea to reduce traffic.

Response P424-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P425 – Gloria Tucay

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P425

Comment P425-1 Great idea for the Aerial Rapid transit:

Could help with traffic relief in that part of LA

Good for environment because it is electric (pollution)

Quiet transportation because it is electric

Creates jobs or retains jobs to run the ART

Reliefs parking in the Dodgers Stadium for not only Dodger Baseball but other stuff going on in the stadium. This will relief some late night traffic in those residential area around stadium.

Response P425-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P426 – Victoria Tucay

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P426

Comment P426-1 I believe the gondola will be a great idea for many reasons. Some of those reasons are less traffic in that populated are of LA. It will also minus the amount of population due to it being electric. Also I believe it will open up parking in Dodger Stadium.

Response P426-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P427 – Breeana Ramos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P427

Comment P427-1 I believe the Aerial Rapid Transit project is a good idea because it would help reduce LA traffic

It is also electric so less pollution in the city

Also will reduce traffic to the neighborhood around dodgers stadium. Give patrons a good nice view from Union Stadium to dodger stadium.

Response P427-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P428 – Jenny Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P428

Comment P428-1 Im in support of the Gondola because I believe it would help with traffic during games, Also it would be good for the air pollution, And I believe it could attract visitors from all around.

Response P428-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P429 – Jennifer Huerta

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P429

Comment P429-1 To whom it may concern I would like to say it would be a great thing to have this cause of transportation with so much traffic issues no only that it will create more jobs for people and it also would be nice to have in our city.

Response P429-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P430 – Sofia Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P430

Comment P430-1 I think the gondola would be good for the community and also the traffic

Response P430-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P431 – Lisa Villarreal

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P431

Comment P431-1 Having the gondola would be great addition to Los Angeles.

Response P431-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P431-2 It will take less time to get to the Stadium, its emissions free. Also free to the public. (Ticket Holders)

Response P431-2 The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P431-3 Thank you for taking my comment.

Response P431-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P432 – Rojelio Esperanza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P432

Comment P432-1 I think it's a great idea. Hope to see it happen soon.

Response P432-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P433 – Gladys Torry

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P433

Comment P433-1 Aerial transit, best idea ever,

Response P433-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P434 – Maria Vargas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P434

Comment P434-1 I like the idea because there will be less traffic, the ticket is free for those who live in the area and it does not pollute.

Response P434-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P435 – Ramona Gonzalez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P435

Comment P435-1 Excellent idea, I approve it 100%, please support this project immediately.

Response P435-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P436 – Yadira Quintero

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P436

Comment P436-1 It will improve traffic a lot and I like that because it is very difficult to live in the area during game season.

Response P436-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P437 – Maria A Coulveros

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P437

Comment P437-1 It will help a lot to improve traffic and there will be more parking spots for us who live here.

Response P437-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P438 – Martina Zuniga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P438

Comment P438-1 I agree with the project because people won't be parking in the neighborhood, it is very difficult to find parking when a game is played, but with this there won't be any problems.

Response P438-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P439 – Cristian Mara

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P439

Comment P439-1 Love the idea of how quick this is going to get there and hopefully helps with the fans no parking in area no more.

Response P439-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P440 – Araceli Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P440

Comment P440-1 I like it because now the traffic is very bad, but it will be less and I think there will be fewer accidents.

Response P440-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P441 - Jesus Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P441

Comment P441-1 Excellent, I have heard about this for a long time and nothing has been done. I agree 100% and I hope it will be built soon.

Response P441-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P442 – Pablo Covarrubias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P442

Comment P442-1 Everything is very good, less pollution and fewer problems.

Response P442-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P443 - Teresa Covarrubias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P443

Comment P443-1 We will be saving a lot of traffic, we won't have to stay at home whenever a game is played and we will be able to go somewhere without worrying.

Response P443-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P444 – Viet Tsan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P444

Comment P444-1 I am greatly support this project w. no condition

Response P444-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P445 – Kin Tsan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P445

Comment P445-1 It is a really good idea. Thanks Metro

Response P445-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P446 - Qun Hua He

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P446

Comment P446-1 I am surely opposing it. The government had better build low-income housing for seniors. Thanks a lot!

Response P446-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P447 - Maribel Precead

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P447

Comment P447-1 My comment is that the gondola will provide a very good service to the community, because the service can be accessed by anyone who wants to use it. First, it would prevent traffic jams and the ride in the gondola would be very comfortable and using the service would be a good experience.

Response P447-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P448 - Kio Chi Ye

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P448

Comment P448-1 I strongly support the gondola

Strong support Gondola

Response P448-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P449 - Liping Ma

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P449

Comment P449-1 Support aerial transit

Support Aerial Rapid Transit

Response P449-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P450 - Amie Wu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P450

Comment P450-1 Support aerial rapid transit

Response P450-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P451 – Tay Saek You

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P451

Comment P451-1 I agree with building the LA Aerial Rapid Gondola. This will improve traffic and the environment.

Response P451-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P452 – Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P452

Comment P452-1 I agree with the construction of the LA aerial gondola. It will further improve the city infrastructure.

Response P452-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P453 – Huang Im Bo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P453

Comment P453-1 I agree with building the LA Aerial Rapid Gondola. This will bring more people to Chinatown businesses.

Response P453-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P454 – Hz Liu Zhang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P454

Comment P454-1 I agree with building the LA Aerial Rapid Gondola. This will generate more business for Chinatown. It also can improve the environment and traffic, and beautify the city. It will advance the urban infrastructure.

Response P454-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P455 – Qing Hing

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P455

Comment P455-1 I strongly support. May Chinatown prosper and business boom.

Response P455-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P456 – Ruo Shun Hu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P456

Comment P456-1 I strongly support. May Chinatown prosper and business boom.

Response P456-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P457 – Ming Hui Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P457

Comment P457-1 Being a resident of LA Chinatown, I greatly welcome the gondola project and support it. Hope it can drive economic growth.

Response P457-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P458 – Zahira Yacoub

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P458

Comment P458-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium) due to lack of transparency!

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? Lack of community consultation:

Response P458-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public comment during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0 Costs and Financial Analysis, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P458-2 The community has been neglected and our voices have not been heard. No one asked us our vision for our community. NO ONE!

Response P458-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the

proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P458-3 We never asked for this project. We don't need or want this project. We don't need more GENTRIFICATION and displacement in this area! #stopthegondola

Response P458-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P459 – Susannah Lowber

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P459

Comment P459-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

It will not relieve traffic but be a huge eye sore obstructing nature. If metro really wants to relieve trafficat dodger stadium how about more shuttles and metro bike docks in The stadium and a bike lane from chinatown to them. Currently there is only one bike rack at dodger stadium. Hundreds of people could be biking in which is better for traffic, and the environment. Metro should be thinking about progressingthe city with climate friendly low impact solutions.

Response P459-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Also, refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P459-2 There is already a shuttle from union station for people to take. The gondola will be a novelty people willride it once or twice put it on instagram and never think about it again meanwhile park users below will have it disrupting time in nature.

Response P459-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[1] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. The average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845). The methodology for estimating the ridership and vehicle miles traveled (VMT) reduction benefits for the proposed Project is outlined in pages 3.17-26 through 3.17 30 and pages 3.17-34 through 3.17-38 of the Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging,

[1] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P459-3 The community has been neglected and our voices have not been heard. No one asked us our vision.

This will be a huge disaster and disgrace if it moves forward.

Response P459-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment Letter P460 – Andy Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P460

Comment P460-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a frequent user of the LA State Historic Park (the "Park"), current resident and home owner in Echo Park, I will be impacted by this prospective project. I am also a Dodger fan and am a season ticket holder and would not use the Gondola to go to Dodger Stadium. I don't drive to Dodger Stadium; I mostly walk to the Stadium and if I don't, I either take the existing Union Station shuttle or ride my bike. I personally do not want or need the Gondola. The stated benefits and upside of the Gondola are heavily outweighed by the costs and downsides. I am deeply concerned about this project for various other reasons:

Response P460-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment also provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P460-2 through P460-7. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P460-2 This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P460-2 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P460-3 Chavez Ravine already has a negative history related to displacement caused by the construction of Dodger Stadium and the Gondola potentially will repeat the same mistakes. This includes displacement and increase rent in the area. I am Chinese American, immigrated from Hong Kong many years ago and first lived in Chinatown near where the Gondola is planned.

Response P460-3 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P460-4 The community in Chinatown will be negatively impacted by the Gondola and this community must be heard and considered. The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P460-4 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90 day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P460-5 The Gondola Project's enormous towers will cause aesthetic impacts in my community. Even though it is only on the south side of the Park, the Gondola will still

negatively affect the views from the Park and generally affect the experience of visitors to the Park.

Response P460-5 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations,

of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P460-6 This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions and in an area that has an established and very popular and treasured park that serves as a respite for community members to seek peace, nature and cleaner air and natural environments. The Gondola would negatively impact this and is not worth any perceived benefit of this form of transportation.

Response P460-6 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment P460-7 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? I do know that Frank McCourt has proven from his ownership of the Dodgers that his ethics, business practices and

motivations are questionable. I just don't think he should be unjustly enriched by allowing the Gondola to move forward. I just don't trust that he is motivated by addressing transportation and congestion issues and this project is almost all motivated by his commercial interests. The public should not pay for this either in direct funding (tax dollars) or the other costs my comments and others have identified.

Response P460-7 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Response P460-4 for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period and the outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P461 – Andrew Beck

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P461

Comment P461-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P461-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P462 – Adrian Herrera Jr

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P462

Comment P462-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P462-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P463 – Jacqueline Lam

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P463

Comment P463-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P463-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P463-2 I feel like it's disgusting for Metro to move forward with this development without including the people in the community, especially those who will directly be effected by the building of this development. It will also increase the impacts of air pollution and overburden the community it resides in. This is unfair to our taxpayers, it is unfair to our people.

Response P463-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N,

Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P464 – Jacqueline Lam

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P464

Comment P464-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

This development does not directly serve the community. It will directly harm it. We do not need a large gondola, we need more laundromats and hospitals in Chinatown. We need community serving developments. Not a gondola that literally only takes you to the dodger stadium.

Response P464-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including healthcare facilities in the surrounding communities. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment Letter P465 – Hillary Barker

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P465

Comment P465-1 I am writing to voice my strong opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I find it appalling that the LA Metro is making deals with billionaires to fund this vanity project, while the voices of working class people who rely on public transit are being ignored. This is not what the people need or want. This is a shameful use of public resources.

Response P465-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project

stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P466 – Margaret Reardon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P466

Comment P466-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). There are many reasons for which I am proposed. As a case manager for clients experiencing housing insecurity, I am concerned about the displacement and increased cost of rent spurred by this project.

Response P466-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P466-2 As a climate advocate, I know that this project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions. This is unacceptable.

I demand change.

Response P466-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO_2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The

proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment Letter P467 – Robert Brunson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P467

Comment P467-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road ,increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P467-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P468 – Ben Wendel

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P468

Comment P468-1 As a long-time LA resident, Dodgers fan, and transit enthusiast, I fully support LA Aerial Rapid Transit. Los Angeles must build much more transit in general, but especially transit that will take people where they want to go. The ART will cut down on emissions and traffic, a win-win for drivers, pedestrians, cyclists, and all others.

The Gondola will become an iconic part of LA infrastructure, as iconic as Dodger Stadium itself. It will bring tourist revenue as well as revenue from baseball fans visiting businesses around Union Station.

Build it, please.

Response P468-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P469 - Kathie Tetreault

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P469

Comment P469-1 I support the innovative and beneficial zero emission Gondola project, and I appreciate the goal of 35%, it's unprecedented for local, small, diverse, and DVBE businesses. We need economic recovery and this project can help. I know this project will be very beneficial to the community, as I grew up outside of the stadium and commuted into downtown for work and to meet friends.

Response P469-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P470 - Vicki & Steve Rank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P470

Comment P470-1 Please DO NOT allow Frank Mc Court to do anymore damage to this city, our California State Historic Park, Chinatown, and the residents/taxpayers of The City Los Angeles. Can we really trust him after what happened to the Los Angeles Dodgers under his ownership? Does he have our city's best interest in mind ? Or is this just another way for him to enrich himself to make money off the land, the parking lot he still owns at the top of Dodger Stadium.

This could be an even bigger land grab, than what was once a quiet, under-served, unnoticed neighborhood in Elysian Park, CHAVEZ RAVINE!

Response P470-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P470-2 Where are the cars going to park to take the Gondola ride?

Response P470-2 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P470-3 What our city needs Is to have a firmer grip on installing a well organized Park and Ride system, as there is at the Hollywood Bowl, Greek Theatre, and LA County Arboretum for it's 2plus Lightscape event and more.

Metro and LA City leaders need to get creative using the land, on the ground, not up in the air! With the money that is proposed for this FLAWED LANDGRAB, to benefit a

man(?) that ran the Dodgers into the ground for his own personal enrichment. Think multiple beach houses, city houses, luxury vacations, jewels, cars. Dining Etc.

This is the worst, horrible, most unbelievable idea, that more than reduces the pain and UNFAIRNESS of what was taken away from the residents of Chavez Ravine!.

This deal wreaks of self enrichment, over the well-being for all the people living in the neighborhood, and all those who visit and use the parks and land, in the surrounding areas! ALL of L.A City is completely affected by this plan. Only someone like Frank Mc Court, the Stadium parking lot landowner, could think of something as deceitful as this "giveaway" that is being proposed!!!

Oh sure he's thinking of us, climate change and traffic$$$$$

Response P470-3 As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion

in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P471 - Veronica L.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P471

Comment P471-1 It's my understanding that the ELDP requires transcripts of each meeting to be produced and made available to the public in the running administrative record. So far, I don't see any on the website or in the dropbox files. Please advise where I can locate them. If not available online, please advise when they will be produced for public access.

Response P471-1 Refer to Appendix B, Public Hearing Transcripts, of this Final EIR, for the transcripts required pursuant to Public Resources Code section 21168.6.9(e)(4), which requires the "transcript of the hearing to be included as an appendix to the final environmental impact report."

Comment P471-2 Aside from appearing in person, will options be provided for remote appearance via video or teleconference? If so, please provide those. I also respectfully request you include such information on the website for those of us that may not have received notice with this information.

Response P471-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four Public Hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment Letter P472 - Judy Kameon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P472

Comment P472-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). There are many areas of concern:

Response P472-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment also provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response P472-2 through P472-6.

Comment P472-2 1) Who is funding this project?

2) What are the real costs?

3) Is this an equitable solution for the level of investment required?

Response P472-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P472-3 4) How will this be used for non-game days?

Response P472-3 Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. The proposed Project allow all residents, employees, and businesses

located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan.

Comment P472-4 5) Will there be further development of Dodger Stadium for non-Stadium events, retail, housing?

Response P472-4 Refer to Section 2.0, Project Description, of the Draft EIR, for a description of the proposed Project, an aerial gondola system intended to be the first permanent transit connection to one of the region's most visited venues. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P472-5 6) How will this affect the State Historic Park, Union Station and the surrounding community?

Response P472-5 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to LAUS, Los Angeles State Historic Park, and the surrounding community. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P472-6 It is difficult to understand the expense of the proposed gondola and all of the impacts based on the little bit of information provided. Further discussion and study should be given to such a monumental proposal.

Response P472-6 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental

impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P473 - Kya-Marina Le

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P473

Comment P473-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As someone who works in the community, I, Kya-Marina Lê, will be impacted by this project. I am concerned about this project for the following reasons:

Response P473-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment also provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response P473-2 through P473-6.

Comment P473-2 The Gondola Project's enormous towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards which will bring light pollution to the surrounding neighborhoods.

Response P473-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral

light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for a discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

Comment P473-3 The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P473-3 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources, including the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P473-4 This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community given that this project has set an example of bypassing community input.

Response P473-4 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the

existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P473-5 This project will lead to displacement and increase the cost of rent in the area.

Response P473-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P473-6 We never asked for this project. We don't need or want this project.

Response P473-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment,

including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P474 - Crystal Cantoran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P474

Comment P474-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I believe this project will displaces families and other community members. Instead money should be allocated to the community to invest in education and other employment opportunities.

Response P474-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P475 - Kanaka Luna

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P475

Comment P475-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P475-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P476 - John Clement

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P476

Comment P476-1 I'm against the Gondola Project because the city has failed to be transparent with the funding for the project. And if tax dollars are going to be used those same tax dollars will have a greater and longer lasting impact on the homeless & mental health crisis tearing this city apart.

Response P476-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing and/or healthcare facilities in the surrounding communities.

Comment Letter P477 - Erica Carlos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P477

Comment P477-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P477-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P478 - Louie Mora

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P478

Comment P478-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P478-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P479 - Roxanna Rendon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P479

Comment P479-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P479-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P479-2 As a resident of Los Angeles County I am concerned for the local residents, this project will affect, the traffic that will increase in the Chinatown area, they will be displaced and impacted by the increase of traffic. Where is the concern for the local residents who live there.

Response P479-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response N, Environmental Justice, for discussion of how no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P479-3 This money should be used more effectively towards local residents or los angeles county public transportation that could always use improving. A gondola is waste of money and space, it will take of the LA historic park and put unsightly poles for this gondola. None of this project reflects how the residents will be impacted and only focuses on tourists or fans who don't live in the area. A very disappointing project.

Response P479-3 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los

Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P480 - Vanessa Abrego

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P480

Comment P480-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P480-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P481 - Nanci Ochoa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P481

Comment P481-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project (The Gondola at Dodger Stadium). As a resident of neighborhood community I am concerned about this project. I foresee the environmental impacts being detrimental to the community and it's surrounding ecosystems. The people in the community have already had historical trauma for the initial choice of profit over people when their homes were destroyed in order to build dodger stadium and does not make sense to continue this unjust path. I foresee opening the door to further commercial development without community involvement and consent. There is a lack of transparency for this project from the very beginning stages and wonder whose interest is really at heart. I urge you to stop the construction of the Gondola.

Response P481-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach

meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding and during the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment Letter P482 - Jessica Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P482

Comment P482-1 I am writing to oppose the gondola project I believe that the city has not been fully transparent with us about the funding . This is just another way to spread the already heavy gentrification going around the city and the displacement of people in small businesses and families living around the area . This in no way will benefit any one else other than dodger stadium and the people fighting for it .

Response P482-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment Letter P483 - Camille Suarez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P483

Comment P483-1 I am a resident of Chinatown, public transit rider, and a frequent visitor of the LA Historic State Park. I writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). THIS IS A BAD IDEA! This project will not reduce traffic and it is ridiculous to invest billions of dollars in a project that does not serve the community. I am an avid Dodger fan and I use the Dodger Express to get to the stadium. The Dodger Express is a great way to get to the stadium meaning we DON'T NEED A GONDOLA.

Response P483-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel.

Comment P483-2 My community fought for years for LA State Historic park and this project will harm historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument. There is limited green space in the community and LA Metro should not invest in the destruction of our green spaces.

Response P483-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square

feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P483-3 Do not encourage future commercial development in Chavez Ravine, without community input and without disclosure to the community.

DO NOT BUILD THE GONDOLA

Response P483-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response C, Project Features, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment Letter P484 - Ester Gonzales

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P484

Comment P484-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This will impact my neighborhood of Lincoln Heights negatively. Stop McCourt from harming our neighborhood further.

Response P484-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P485 - Michelle Montenegro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P485

Comment P485-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P485-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P486 - Caylin G

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P486

Comment P486-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a born and raised “Angeleno” I have seen the city change in many ways. Some ways positive, most negative. The LA ART Project is definitely amongst the negative possible changes of the city. It will impact our residents of Chinatown, women, children, elderly, small businesses who are already struggling for affordable housing and rents. In many ways LA ART is inefficient by not having environmental impacts in mind, parking in mind, or providing relief and affordable housing to our fellow Angelenos. I urge you to please reconsider this project and come up with something that works for the community and the goal of transportation.

Response P486-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project’s system, approximately 20 percent of the fans could take aerial transit connected to Metro’s regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural

Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment Letter P487 - Gabriela Rosales

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P487

Comment P487-1 Hello! I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos. Nobody likes sitting in the traffic that's on Sunset Blvd during dodger games!

Response P487-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P488 - Ricky de Laveaga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P488

Comment P488-1 How does one submit written comments on the Aerial Rapid Transit Technology LLC proposal? There is zero information on submitting written comment on https://www.metro.net/projects/aerial rapid-transit/#tell-us-what-you-think

Response P488-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four Public Hearings. Comments on the draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified).

Comment Letter P489 - Ana Silva

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P489

Comment P489-1 Good morning! I am writing today to vote NO for the proposed gondola project through Elysian Park to Dodger Stadium.

Response P489-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P489-2 I feel it would be harmful to the balance of the park. Birds, wildlife, bees, fauna- a project like this would be terribly disruptive, especially since there are already transportation options available that could be expanded without such harmful impact.

Response P489-2 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P489-3 I think residents of the neighborhood do not need thousands of people traveling over their backyards and peering in through their windows. The proposal says that it can carry 5000 people an hour to the stadium… for a venue that has a capacity of over 54,000- the math doesn't really add up in my opinion. I also feel it would pose a security risk. I am a Dodger season ticket holder, and a lifelong Angeleno- so I feel I really have an insight into this issue.

Response P489-3 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities,

including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system.

Comment P489-4 I would prefer to see perhaps the Dodger Express program expanded and switch to hydrogen or electric busses. That would be less disruptive to the community and the beautiful natural landscape that is Chavez Ravine & Elysian Park. So once again, a very emphatic NO vote on this project!

Response P489-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Response 489-2 regarding how the proposed Project has less than significant operational impacts, including to parks.

Comment Letter P490 - Kelle Leonard

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P490

Comment P490-1 I think that the Aerial Rapid Transit (ART) project should not be allowed to move forward in any form for multiple reasons.

It is not meant to provide any useful public transportation to the local communities. It connects Union Station to only two points in LA, LA State Historic Park and Dodger Stadium. And the park is a rather flat and easy 15 minute/half mile walk from Union Station already.

Response P490-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P490-2 It also can't even handle an effective capacity of people for events at Dodger Stadium. The ART's proposed maximum capacity of 5,000 people per hour is unlikely to make

a noticeable change in area congestion during events, as Dodger Stadium holds 56,000 people.

It would take ART more than 11 hours running at its most efficient to fill the stadium. People are not likely to arrive to events more than 2 or 3 hours in advance, allowing for at most 10-15,000 people to make use of it for events. This leaves 41-46,000 people to arrive as they have been, continuing to congest the surrounding area.

There would inevitably also be mass crowding at stations when late comers arrive as event start times approach. And even more so when the events end and those 10-15,000 people want to leave Dodger Stadium at once. Are people supposed to accept 2-3 hour waits to return to Union Station?

Response P490-2 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue

waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

Comment P490-3 Besides there being no real community or logistical benefits to this project, it will also alter and demolish the landscape and structures in many historic and underrepresented areas, while interrupting countless views of the city. The only people who will benefit from this project are the private company, AART, who has proposed it, the contractors they would hire, and the owners of Dodger Stadium.

Response P490-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design

of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 3.05, Cultural Resources, Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P490-4 Metro needs to stop considering this unsolicited private developer cash grab disguised in the form of "transit." Our city's resources need to support real projects that benefit real Angelenos.

Response P490-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P491 - Petrona Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P491

Comment P491-1 I am a Los Angeles born and raised community member! I have a deep love for chinatown because that is where I would often go shopping with my family! Here I hold the most cherished moments of my childhood.

Response P491-1 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P491-2 As such, I know how impacted the chinatown community will be by this project. I writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). With growing pollution and environmental justice concerns this will only have disastrous affects on the local community. It will create hostile living situation and make the surrounding environment unpleasant for community members. Additionally this project has received zero feedback from the people! It is irresponsible to continue with this project solely based on the monetary gains! Listen to the community!!!!!

Response P491-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Further, public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the

Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P492 - Porsha Pearson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P492

Comment P492-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Please don't ruin LA State Historic Park by putting a ridiculous Gondola, which the community did not ask for, in the sky above it.

Response P492-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.16, Public Services, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to

neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding community. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P492-2 As a community member and property owner of Echo Park and DTLA, I am very concerned about how this project came about and who exactly is paying for it. If taxpayers are paying for it, then we didn't ask for it and don't want it. If the McCourts are paying for it, why would you want to partner with a family that has a history of mishandling finances and making the Dodgers the laughing stock of the sports world?

Response P492-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P492-3 I purchased a condo and moved to DTLA in 2006 and have enjoyed all the public transportation improvements that LA Metro has put in place since then. I am a regular user of public transportation, mostly bus and train, but also Metrobike and Metrolink occasionally. There are so many worthwhile improvements that could be done to our existing system instead of a Dodger Stadium Gondola. LA always gets ridiculed because of their low quality public transportation, and when I go to other cities, I get it. So please don't make it worse. Thank you.

Response P492-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors

drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment Letter P493 - Armando Ruiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P493

Comment P493-1 I live and work in Lincoln Heights. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This proposed project is beyond disrespectful and needs to be halted asap. My neighborhood is currently being sold out by greedy developers and council members who don't care about the most vulnerable. This project will exacerbate the homeless problem in my community by pushing me and my community out of our homes. It's is already difficult il enough for us to make ends meet working full time and going to school. It's saddening to see those who are supposed to be there to help us only make things worse for the most vulnerable. Metro should be focused on creating free public transportation for all Los Angeles. This would help fight climate change and set the bat for the rest of the world. Please prioritize the most vulnerable, not the wealthy.

Response P493-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would

convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter P494 - Laura Hayes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P494

Comment P494-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P494-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P495 - Donna Harati

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P495

Comment P495-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P495-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P495-2 This project does not benefit the community: it will displace low income residents and small businesses and will bring in luxury apartments that do not address the housing crisis. I work in the area and the project will only add to traffic and congestion problems.

Response P495-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P495-3 There is little transparency with the project. I strongly oppose it.

Response P495-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to

Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P496 - Jennifer Rodriguez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P496

Comment P496-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P496-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P496-2 I am a resident of Cypress Park and a cyclist/alternative modes of transportation advocate. Cypress Park is one metro stop away from Chinatown. The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult due to a lack of bike lanes, limited parking, and overall congestion and this project will make it worse.

Response P496-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and

other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P496-3 We never asked for this project. We don't need or want this project. Please listen to the community, the impacted residents, and think about who this project will benefit. If it doesn't benefit the current community and their way of life, don't impose another unwanted project on them. This community is lacking a grocery store, a gondola project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P496-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including grocery stores in the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel.

Comment Letter P497 - Liliana Cortez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P497

Comment P497-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a resident of Council District 1, dedicated cyclist, and frequent park patron at Elysian Park, I, Liliana Cortez, will be impacted by this project. I am concerned about this project for the following reasons:

Response P497-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P497-1 through 497-7.

Comment P497-2 (1) The Gondola Project's push of traffic into surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community. As a cyclist and daily commuter, I'm directly exposed to exhaust fumes and being further exposed to them in an area with already dense traffic, this also impacts my personal health.

Response P497-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium. Moreover, the Draft EIR analysis reports that the proposed Project would reduce air pollutant emissions in the

area. As shown in Table 3.03-5, Maximum Mass Daily Emissions Due to Operation of the Project, of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles travelled and thereby decreasing emissions compared to existing conditions. As a fixed guideway transit project, providing new high-frequency high speed transit connections between the regional transit hub of LAUS and Dodger Stadium, the proposed Project is forecast to reduce vehicle miles travelled (VMT), as game and event attendees shift their travel mode from driving to Dodger Stadium to utilizing transit on the proposed Project. As an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies (see Section 3.8.4 of the Draft EIR and Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for additional discussion). The operational VMT and trips for the existing, Build Out, and Horizon Year that are used to calculate these mobile emissions are presented in Table A.2-3 of Draft EIR Appendix D, Air Quality/Health Risk Assessment Technical Report.

Comment P497-3 (2) The Gondola Project will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult because of lack of protected bike lanes for cyclists to help with the flow of traffic, these are already densely populated residential streets, and the high number of pedestrians in the area. This project will make these conditions worse and further exacerbate accidents involving distracted and impatient drivers against pedestrians and cyclists. Inclusively, my friends and I use the residential streets surrounding the area to reach Elysian Park so as to avoid high traffic streets where drivers are already driving at excessive and dangerous speeds.

Response P497-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include pedestrian access enhancements along the proposed Project alignment, including landscape and hardscape improvements, shade structures, and potential seating.

Comment P497-4 (3) The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, the Historic Union Station, and the Public de Los Angeles Historic Monument. These are all places that I, as a local resident, enjoy visiting on a regular basis due to their historic nature and the efforts community leaders have put into preserving these historic resources. Do not ignore our pleas to preserve these historic monuments for the sake of a project that will further erode, destroy, and whitewash our city's history.

Response P497-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P497-5 (4) It goes without saying that this project will lead to increased displacement of long-time residents, many of whom are monolingual elders, and it will increase the rent cost of rent in the area.

Response P497-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P497-6 (5) *Metro went forward with this project without an open public process and without competitive bidding.* I don't understand the ownership or operation of the project because these details have been hidden from the community. Who is paying for this project? Who will pay for its maintenance? Will taxpayers such as myself be left holding the bag? The community has been neglected and our voices have not been heard. No-one asked us our vision for our community and our district, and whether it included a gondola in it.

Response P497-6 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P497-7 *Most imporantly: WE NEVER ASKED FOR THIS PROJECT. WE DON'T NEED OR WANT THIS GONDOLA.* Stop catering to a rich man who doesn't even go here. If we, the

residents of Los Angeles were able to deny a billionaire for mayor, we will deny Frank McCourt.

Response P497-7 Refer to Response P497-7 for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P498 - James Martin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P498

Comment P498-1 Just visited the public viewing of the EIR. This thing is going to look horrible from the Historic Park. The consulting firm hired makes it seem really hideous. Awful. Please don't. Busy, not that useful, doesn't address the issue of traffic, the report is inaccurate.

Response P498-1 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The proposed Project would also enhance the public realm, aesthetic lighting/signage, connections to open space, transit, and community facilities.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, and design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood.

Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel.

Comment Letter P499 - Jana Rosenblatt

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P499

Comment P499-1 I whole heartily support the innovative and beneficial zero emission Gondola project, and I appreciate the goal of 35%, it's unprecedented for local, small, diverse, and DVBE businesses. We need economic recovery, and this project can help.

Response P499-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P500 - Susan Durbin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P500

Comment P500-1 Morning my name is Susan Durbin, my phone number is area code 530 219 6237. I'm trying to find if comments on the DEIR for the Gondola project to Dodger stadium are being posted online by Metro as they are received since I would like to read them. Please get back to me, thank you.

Response P500-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to the proposed Project's SB 44 website for correspondence related to the proposed Project, including comments on the Draft EIR.

Comment Letter P501 – Keiko Utsumi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P501

Comment P501-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a resident of Los Angeles, someone who frequents Chinatown to visit family and be with community, I, Keiko Utsumi, will be impacted negatively by this project. I am concerned about this project for the following reasons:

Response P501-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided in Responses P501-2 through P501-3.

Comment P501-2 Firstly, it's a gentrification project that will increase rent in the area, leading to displacement of local residents. It's an obvious ploy for further future development in the Chavez Ravine, though the community residents have not been involved in the decision making or input process, nor given proper or accurate disclosure. It is unacceptable that Metro moved this project forward WITHOUT an open public process or competitive bidding, making the whole thing confusing to community members who never asked for the gondola to be built.

Response P501-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under

CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. This comment also raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P501-3 Not only will it cause substantial pollution, further harming the quality of life of the Chinatown community members, but it will also make traffic worse despite being marketed as a solution. The gondola will significantly increase traffic around Chinatown and Union Station, which is already bad due to consistent construction, road obstructions, and downtown busyness. It will also push traffic to surround neighborhoods, which will worsen the air quality and disrupt the lives of the community members who are already overburdened. This project is not ethical in any way, and it will directly harm community members. It must be put to an end.

Response P501-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Moreover, the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment

Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Also refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Further, public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment Letter P502 – Katherine Chi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P502

Comment P502-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). The gondola is an expensive project with a high environmental cost, that will do little to ease traffic, and only make living more expensive for people of the community. Please reconsider this project and divert funds elsewhere.

Response P502-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P503 – Sean Mason

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P503

Comment P503-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

We need mass public transportation in LA. Not this. Not shuttling a maximum of 12 people every 30 minutes less than a mile. Not by dangling Boeing-747s 40-feet above the roofs of citizens throughout Chinatown. Not by erecting half-a-dozen 6 story tall steel obelisks in the heart of cultural centers 'cuz muh blue sport ball team'. Not this. This is state is the 4th largest economy in the world, and yet we NEED--nay we MUST, it is MANDATORY---to proceed with this Frank McCourt monstrosity? Yikes. Do us all a favor, resign, and go work flipping burgers. It'll build some character and you'll work closer with the community than you ever have with the cumulative decades of elected office from everyone involved with this project.

Response P503-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P504 – Sang Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P504

Comment P504-1 *Speaker 1:* Our next speaker is Mr. Wong.

Sang Wong: I'm a resident in Chinatown, I've lived here for many years.

We are strongly opposed to this gondola project

Speaker 1: [inaudible] lived Chinatown for many, many years. We oppose the gondola project! [-1]

Response P504-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P505 – Michelle Fong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P505

Comment P505-1 I am an LA native and current resident, and I am opposed to the gondola project. Our community needs environmentally and socially responsible projects, and creating a gondola in a community that is struggling to afford basic needs is *not* what our city needs. Green lighting a project that cannot prove itself to be good for our environment, and displace long time residents of Los Angeles, is something Angelenos will be ashamed of for generations to come. The little public transparency behind this project is a sign that folks in charge *know* it is not the right thing to do. They aren't doing it for Angelenos, they are doing it for themselves.

Invest in our infrastructure meaningfully, do it thoughtfully, and do it proudly in the open with community input.

Listen to what Angelenos are saying. This project is not what the community wants, nor what it needs.

Thank you for listening,

Response P505-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. Further, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of

the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Appendix A, Scoping report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P506 – Erik Otsea

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P506

Comment P506-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Our community didn't ask for this project.The project will require the use of public rights of way, public airspace, and public lands for the placement of multiple towers with suspended cars intended to move a few thousand people in each direction between Union Station and Dodger Stadium for games and events.

Response P506-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes

alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P506-2 The plan for massive towers ranging from six stories (84 ft) to 13 stories (195 ft) in height - is frightening and ugly.

Response P506-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P506-3 Our neighborhoods will be forever changed.

Response P506-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13,

Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P506-4 Operating at maximum capacity is equivalent to 42 shipping container-size gondolas flying over our neighborhoods. A recent poll shows 76% of Angelenos oppose McCourt's gondola. There is already a free bus shuttle that takes fans to Dodger Stadium.

OUR COMMUNITY DOES NOT WANT OR NEED THE GONDOLA.

Response P506-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P506-1 for an overview of the need for the proposed Project. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P506-5 Building a project of this magnitude when the Dodgers only have 81 home games a year and limited events is a waste of taxpayer dollars. What else is McCourt not telling us? Maybe planning on making Dodger Stadium a 365 day theme park? Maybe setting the stage for the Riboli Family to build their 900 apartmentcomplex on our state park?

Whatever it is - We say "No!"

Response P506-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P506-1 for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial

Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter P507 – Cameron McManus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P507

Comment P507-1 Hello! I'm writing in opposition to the dodgers stadium gondola project. As a resident and employee of the area, I don't want one of our few great parks (LA historic) obstructed by a private and largely single use piece of infrastructure.

Response P507-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment P507-2 A proper bus rapid transit system on sunset seems to be the real answer for the residents of the area, as that could serve the community and connect us to the greater metro transit, in addition to serving the game day traffic.

Response P507-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit

connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415

passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment P507-3 I'd much prefer public funds go towards projects that serve the communities as a whole and don't risk becoming an expensive tourist attraction.

Response P507-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P508 – Nancy De Los Santos Reza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P508

Comment P508-1 To whom it may concern: I write this as a long-time member of the Solano Canyon community.

I am completely and unequivocally AGAINST this proposed gondola monstrosity being built in our lovely and historic neighborhood.

Response P508-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P508-2 I am concerned about our neighborhood's historic infrastructure, our neighbor's privacy, our safety, and public costs associated with this project.

Response P508-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and

Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P508-3 Our community didn't ask for this project. The project will require the useof public rights of way, public airspace, and public lands for the placement of multiple towers with suspended cars intended to move a few thousand people in each direction between Union Station and Dodger Stadium for games and events.

Response P508-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's commitments to community benefits. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, directly led the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment P508-4 With massive towers ranging from six stories (84 ft) to 13 stories (195 ft) in height, our neighborhoods will be forever changed. Operating at maximum capacity is equivalent to 42 shipping container-size gondolas flying over our neighborhoods. A recent poll shows 76% of Angelenos oppose McCourt's gondola. There is already a free bus shuttle that takes fans to Dodger Stadium.

*OUR COMMUNITY DOES NOT WANT OR NEED THE GONDOLA. *

NO ONE in this neighborhood is "for" this horrible structure. NO ONE!

Response P508-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per

direction (pphpd). Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P508-5 Building a project of this magnitude when the Dodgers only have 81 home games a year and limited events is a waste of taxpayer dollars. What else is McCourt not telling us? Maybe planning on making Dodger Stadium a 365-day theme park? Maybe setting the stage for the Riboli Family to build their 900-apartment complex on our state park?

Whatever it is - We say "No!"

NO GONDOLA. EVER.

Response P508-5 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment Letter P509 – Andrew Ko

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P509

Comment P509-1 I live in San Marino. Metro shriveled in plans to complete the 710.

Completion of 710 from 10 to the 210 would do more for traffic congestion than building the gondola. Now, more traffic comes through San Marino.

Metro is not a transportation expert, it is a political pawn.

Response P509-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/ State Park Station. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment Letter P510 – Douglass Abramson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P510

Comment P510-1 I support the gondola. (Even though I'm not a Dodgers fan.)

Response P510-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P511 – LA Parks Alliance

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P511

Comment P511-1 Attached, please find 8 Letters from businesses in Chinatown.

--LA Parks Alliance is a *catalyst for community leaders, park advocates, and environmentalists* who seek to protect Los Angeles Historic State Park from private interest development efforts that would forever change the welcoming nature, historical significance, and dramatic, open vistas of the park.

Response P511-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted. Seven letters were attached to this communication and have been attributed to their respective authors. Refer to Responses to Comment Letters P512 through P518.

Comment Letter P512 – 640_N Broadway

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P512

Comment P512-1 My name is [illegible], I have a business in Chinatown.

My small Chinatown business, our hard-working employees, and I are extremely concerned about the plan to build a 1.2-mile gondola between the Union Station and Dodger Stadium. This Los Angeles Air Rapid Transit LAART project will not provide significant transportation benefits to the public, and certainly not to the communities in which it is imposed. This ill-conceived gondola project only serves Frank McCourt and his undisclosed development plans.

Response P512-1 This is a duplicate of Comment P518-1. Refer to Response to P518-1.

Comment P512-2 (1) The gondola station is too far from many businesses in Chinatown to generate business. It is not helping our business that gondola riders take up all the nearby parking spaces and then take the gondola over us.

Response P512-2 This comment is a duplicate of Comment P518-2. Refer to Response to Comment P518-2.

Comment P512-3 (2) Businesses and communities in Chinatown will be affected by increased car traffic. Many businesses in Chinatown do not have parking spaces or have to pay for parking for customers. If affordable on-street parking reduces and the private parking lot increases its rates, this will make it more difficult for residents to shop, dine and access essential services in Chinatown. It will significantly affect the disabled people and families who visit the elderly.

Response P512-3 This is a duplicate of Comment P518-3. Refer to Response P518-3.

Comment P512-4 (3) Chinatown businesses are concerned that we will eventually need to subsidize the gondola through additional property taxes. This project was pushed forward without community input and transparency. With the promise that it would be 100% privately funded, they do not provide any information about how the system will generate enough revenue to maintain itself. We also don't know the total cost of the project, including maintenance, operation management, security and insurance. Similar projects in London and Portland were also promised to be privately funded. but the cost overran eventually, and it ended up requiring public funding.

Response P512-4 This is a duplicate of Comment P518-4. Refer to Response P518-4.

Comment P512-5 We are concerned that our Chinatown community is being sacrificed for a private developer's tourism gondola project. This is our community, not Frank McCourt's community. Let our elected officials remember that their decisions should consider our communities first and foremost.

We are very frustrated that after 2 years of our community speaking out against it, the city government continues to ignore our voices.

Response P512-5 This is a duplicate of Comment P518-5. Refer to Response P518-5.

Comment Letter P513 - 652 N Broadway

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P513

Comment P513-1 My name is [illegible], I have a business in Chinatown.

My small Chinatown business, our hard-working employees, and I are extremely concerned about the plan to build a 1.2-mile gondola between the Union Station and Dodger Stadium. This Los Angeles Air Rapid Transit LAART project will not provide significant transportation benefits to the public, and certainly not to the communities in which it is imposed. This ill-conceived gondola project only serves Frank McCourt and his undisclosed development plans.

Response P513-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs,

signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. During construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P513-2 (1) The gondola station is too far from many businesses in Chinatown to generate business. It is not helping our business that gondola riders take up all the nearby parking spaces and then take the gondola over us.

Response P513-2 Refer to Response to P518-2 for discussion of how the proposed Project would provide numerous benefits to local businesses in Chinatown.

Comment P513-3 (2) Businesses and communities in Chinatown will be affected by increased car traffic. Many businesses in Chinatown do not have parking spaces or have to pay for parking for customers. If affordable on-street parking reduces and the private parking lot increases its rates, this will make it more difficult for residents to shop, dine and access essential services in Chinatown. It will significantly affect the disabled people and families who visit the elderly.

Response P513-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take

Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Response P518-3 for discussion of how the proposed Project would provide numerous benefits to local businesses in Chinatown.

Comment P513-4 (3) Chinatown businesses are concerned that we will eventually need to subsidize the gondola through additional property taxes. This project was pushed forward without community input and transparency. With the promise that it would be 100% privately funded, they do not provide any information about how the system will generate enough revenue to maintain itself. We also don't know the total cost of the project, including maintenance, operation management, security and insurance. Similar projects in London and Portland were also promised to be privately funded. but the cost overran eventually, and it ended up requiring public funding.

Response P513-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P513-5 We are concerned that our Chinatown community is being sacrificed for a private developer's tourism gondola project. This is our community, not Frank McCourt's community. Let our elected officials remember that their decisions should consider our communities first and foremost.

We are very frustrated that after 2 years of our community speaking out against it, the city government continues to ignore our voices.

Response P513-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero

Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P514 – Ching Je

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P514

Comment P514-1 My name is Ching Je and I have a business in Chinatown.

I and my fellow Chinatown small businesses, along with our hardworking employees, have extremely serious concerns about Frank McCourt's plans to build a 1.2 mile long aerial gondola between Union Station and Dodger Stadium. This project, known as Los Angeles Aerial Rapid Transit (LAART), does not provide significant transportation benefits to the public, and certainly does not benefit the community it is being thrust upon. This ill conceived gondola serves only Frank McCourt and his undisclosed development plans.

Response P514-1 This is a duplicate of Comment P518-1. Refer to Response P518-1.

Comment P514-2

- **The gondola stations are too far away from many businesses in Chinatown to help us economically.**

  "Parking in Chinatown" defeats the purpose of the zero emissions promise being touted by McCourt. It does not help our businesses for gondola customers to take all of the parking in the neighborhood and then fly over us in the gondola.

Response P514-2 This comment is a duplicate of Comment P518-2. Refer to Response P518-2.

Comment P514-3

- **Chinatown businesses and community would suffer from the increased traffic.** Many businesses in Chinatown don't have parking or must pay their landlord fees for their customers to use their parking lot. If affordable street parking disappears and parking rates at private lots increase, this would make it more difficult for residents to shop, dine, and access essential services in Chinatown. Disabled people and families visiting elders in senior homes would be especially hurt.

Response P514-3 This is a duplicate of Comment P518-3. Refer to Response P518-3.

Comment P514-4

- **Businesses in Chinatown are concerned that we will eventually be required to subsidize this gondola through additional property taxes.** This project is being pushed forward without real community input and transparency, with promises that it will be 100% privately financed, but there has been no

information about how the gondola system would sustain itself financially. We also don't know what the total cost for the project will be, including maintenance, operation, security, and insurance. Similar projects in London and Portland also promised to be privately financed, but required public funding in the end due to cost overruns.

Response P514-4 This is a duplicate of comment P518-4. Refer to Response P518-4.

Comment P514-5 We are concerned that the well-being of our communities on the ground are being sacrificed for a private developer's site-seeing ride. This is our community, not Frank McCourt's. It's time for our elected officials to remember that their decisions are supposed to benefit our communities first.

It is extremely disturbing to us that after 2 years of our communities crying foul, the City continues to ignore our voices.

We strongly encourage you to oppose and cancel this project.

Response P514-5 This is a duplicate of Comment P518-5. Refer to Response P518-5.

Comment Letter P515 – Kun G Leon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P515

Comment P515-1 My name is [Kun Leon], I have a business in Chinatown.

My small Chinatown business, our hard-working employees, and I are extremely concerned about the plan to build a 1.2-mile gondola between the Union Station and Dodger Stadium. This Los Angeles Air Rapid Transit LAART project will not provide significant transportation benefits to the public, and certainly not to the communities in which it is imposed. This ill-conceived gondola project only serves Frank McCourt and his undisclosed development plans.

Response P515-1 This is a duplicate of Comment 518-1. Refer to Response P518-1.

Comment P515-2 (1) The gondola station is too far from many businesses in Chinatown to generate business. It is not helping our business that gondola riders take up all the nearby parking spaces and then take the gondola over us.

Response P515-2 This is a duplicate of Comment P518-2. Refer to Response P518-2.

Comment P515-3 (2) Businesses and communities in Chinatown will be affected by increased car traffic. Many businesses in Chinatown do not have parking spaces or have to pay for parking for customers. If affordable on-street parking reduces and the private parking lot increases its rates, this will make it more difficult for residents to shop, dine and access essential services in Chinatown. It will significantly affect the disabled people and families who visit the elderly.

Response P515-3 This is a duplicate of Comment P518-3. Refer to Response P518-3.

Comment P515-4 (3) Chinatown businesses are concerned that we will eventually need to subsidize the gondola through additional property taxes. This project was pushed forward without community input and transparency. With the promise that it would be 100% privately funded, they do not provide any information about how the system will generate enough revenue to maintain itself. We also don't know the total cost of the project, including maintenance, operation management, security and insurance. Similar projects in London and Portland were also promised to be privately funded. but the cost overran eventually, and it ended up requiring public funding.

Response P515-4 This is a duplicate of Comment P518-4. Refer to Response P518-4.

Comment P515-5 We are concerned that our Chinatown community is being sacrificed for a private developer's tourism gondola project. This is our community, not Frank McCourt's community. Let our elected officials remember that their decisions should consider our communities first and foremost.

We are very frustrated that after 2 years of our community speaking out against it, the city government continues to ignore our voices.

Response P515-5 This is a duplicate of Comment P518-5. Refer to Response P518-5.

Comment Letter P516 – Ling Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P516

Comment P516-1 My name is Ling Ling, I have a business in Chinatown.

My small Chinatown business, our hard-working employees, and I are extremely concerned about the plan to build a 1.2-mile gondola between the Union Station and Dodger Stadium. This Los Angeles Air Rapid Transit LAART project will not provide significant transportation benefits to the public, and certainly not to the communities in which it is imposed. This ill-conceived gondola project only serves Frank McCourt and his undisclosed development plans.

Response P516-1 This is a duplicate of Comment P518-1. Refer to Response P518-1.

Comment P516-2 (1) The gondola station is too far from many businesses in Chinatown to generate business. It is not helping our business that gondola riders take up all the nearby parking spaces and then take the gondola over us.

Response P516-2 This is a duplicate of Comment P518-2. Refer to Response P518-2.

Comment P516-3 (2) Businesses and communities in Chinatown will be affected by increased car traffic. Many businesses in Chinatown do not have parking spaces or have to pay for parking for customers. If affordable on-street parking reduces and the private parking lot increases its rates, this will make it more difficult for residents to shop, dine and access essential services in Chinatown. It will significantly affect the disabled people and families who visit the elderly.

Response P516-3 This is a duplicate of Comment P518-3. Refer to Response P518-3.

Comment P516-4 (3) Chinatown businesses are concerned that we will eventually need to subsidize the gondola through additional property taxes. This project was pushed forward without community input and transparency. With the promise that it would be 100% privately funded, they do not provide any information about how the system will generate enough revenue to maintain itself. We also don't know the total cost of the project, including maintenance, operation management, security and insurance. Similar projects in London and Portland were also promised to be privately funded. but the cost overran eventually, and it ended up requiring public funding.

Response P516-4 This is a duplicate of Comment P518-4. Refer to Response P518-4.

Comment P516-5 We are concerned that our Chinatown community is being sacrificed for a private developer's tourism gondola project. This is our community, not Frank McCourt's community. Let our elected officials remember that their decisions should consider our communities first and foremost.

We are very frustrated that after 2 years of our community speaking out against it, the city government continues to ignore our voices.

Response P516-5 This is a duplicate of Comment P518-5. Refer to Response P518-5.

Comment Letter P517 – Eduardo F Rosario

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P517

Comment P517-1 My name is Geoff Kia Miller and I have a business in Chinatown.

I and my fellow Chinatown small businesses, along with our hardworking employees, have extremely serious concerns about Frank McCourt's plans to build a 1.2 mile long aerial gondola between Union Station and Dodger Stadium. This project, known as Los Angeles Aerial Rapid Transit (LAART), does not provide significant transportation benefits to the public, and certainly does not benefit the community it is being thrust upon. This ill conceived gondola serves only Frank McCourt and his undisclosed development plans.

Response P517-1 This is a duplicate of Comment P518-1. Refer to Response P518-1.

Comment P517-2

- **The gondola stations are too far away from many businesses in Chinatown to help us economically.**

  "Parking in Chinatown" defeats the purpose of the zero emissions promise being touted by McCourt. It does not help our businesses for gondola customers to take all of the parking in the neighborhood and then fly over us in the gondola.

Response P517-2 This is a duplicate of Comment P518-2. Refer to Response P518-2.

Comment P517-3

- **Chinatown businesses and community would suffer from the increased traffic**. Many businesses in Chinatown don't have parking or must pay their landlord fees for their customers to use their parking lot. If affordable street parking disappears and parking rates at private lots increase, this would make it more difficult for residents to shop, dine, and access essential services in Chinatown. Disabled people and families visiting elders in senior homes would be especially hurt.

Response P517-3 This is a duplicate of Comment P518-3. Refer to Response P518-3.

Comment P517-4

- **Businesses in Chinatown are concerned that we will eventually be required to subsidize this gondola through additional property taxes.** This project is being pushed forward without real community input and transparency, with promises that it will be 100% privately financed, but there has been no

information about how the gondola system would sustain itself financially. We also don't know what the total cost for the project will be, including maintenance, operation, security, and insurance. Similar projects in London and Portland also promised to be privately financed, but required public funding in the end due to cost overruns.

Response P517-4 This is a duplicate of Comment P518-4. Refer to Response P518-4.

Comment P517-5 We are concerned that the well-being of our communities on the ground are being sacrificed for a private developer's site-seeing ride. This is our community, not Frank McCourt's. It's time for our elected officials to remember that their decisions are supposed to benefit our communities first.

t is extremely disturbing to us that after 2 years of our communities crying foul, the City continues to ignore our voices.

We strongly encourage you to oppose and cancel this project.

Response P517-5 This is a duplicate of Comment P518-5. Refer to Response P518-5.

Comment Letter P518 – Geoff Kia Miller

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P518

Comment P518-1 My name is Geoff Kia Miller and I have a business in Chinatown.

I and my fellow Chinatown small businesses, along with our hardworking employees, have extremely serious concerns about Frank McCourt's plans to build a 1.2 mile long aerial gondola between Union Station and Dodger Stadium. This project, known as Los Angeles Aerial Rapid Transit (LAART), does not provide significant transportation benefits to the public, and certainly does not benefit the community it is being thrust upon. This ill conceived gondola serves only Frank McCourt and his undisclosed development plans.

Response P518-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the

proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P518-2

- The gondola stations are too far away from many businesses in Chinatown to help us economically.
- "Parking in Chinatown" defeats the purpose of the zero emissions promise being touted by McCourt. It does not help our businesses for gondola customers to take all of the parking in the neighborhood and then fly over us in the gondola.

Response P518-2 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. Refer to the Parking Study for a discussion of the proposed Project's parking management plan. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential

partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P518-3

- **Chinatown businesses and community would suffer from the increased traffic**. Many businesses in Chinatown don't have parking or must pay their landlord fees for their customers to use their parking lot. If affordable street parking disappears and parking rates at private lots increase, this would make it more difficult for residents to shop, dine, and access essential services in Chinatown. Disabled people and families visiting elders in senior homes would be especially hurt.

Response P518-3 Refer to Response P518-2 for discussion of the Parking Study and parking management plan, and how the proposed Project would help local businesses in Chinatown.

Comment P518-4

- **Businesses in Chinatown are concerned that we will eventually be required to subsidize this gondola through additional property taxes.** This project is being pushed forward without real community input and transparency, with promises that it will be 100% privately financed, but there has been no information about how the gondola system would sustain itself financially. We also don't know what the total cost for the project will be, including maintenance, operation, security, and insurance. Similar projects in London and Portland also promised to be privately financed, but required public funding in the end due to cost overruns.

Response P518-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision

making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P518-5 We are concerned that the well-being of our communities on the ground are being sacrificed for a private developer's site-seeing ride. This is our community, not Frank McCourt's. It's time for our elected officials to remember that their decisions are supposed to benefit our communities first.

It is extremely disturbing to us that after 2 years of our communities crying foul, the City continues to ignore our voices.

We strongly encourage you to oppose and cancel this project.

Response P518-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response P518-4 for discussion of the proposed Project's outreach and community engagement during each stage of the environmental review process.

Comment Letter P519 – Virginia Pinedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P519

Comment P519-1 I am certainly NOT in favor of a Monster People Transporting Gondola being built anywhere near our historic neighborhood. This idea is just unacceptable. This construction will only pave the way for more gentrification in our area, something that would have a negative impact on our small community.

Response P519-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P519-2 Affordable Housing is what is needed, not a Gondola to be used by a select few from Union Station to Dodger Stadium. Public Transportation is available and should be continued to be used for that purpose, getting fans to the Stadium.

Response P519-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing in the surrounding communities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no

additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter P520 – Linda Glatstein

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P520

Comment P520-1 I attended the informational meeting at Cathedral High . I think LA Metro conducted the meeting non responsive and deceptive manner . I'm very disappointed in the lack of concern for the affect community. I stand against the gondola scheme.

Response P520-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR. After the protesters left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment Letter P521 – Julian Engin

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P521

Comment P521-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P521-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P522 – Andrea Harrow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P522

Comment P522-1 As a resident of Elysian Park (Dodger Stadium is my backyard,) I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P522-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P522-2 Fans already have a free bus they can take. Increase the availability of an electric bus fleet rather than the proposed expensive gondola that is not intended to serve angelenos 24/7 365 days. Building the gondola would negatively impact the Los Angeles State Park and will not add an affordable travel alternative.

Response P522-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of

the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. As discussed in Topical Response C, Project Features, the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P522-3 The proposal is another screen for advertising and consumption. Fans already park in our neighborhood because they do not want to pay for parking. Dodgers should make more free electric buses available from outlying areas and city should increase bus lanes. Maybe Dodgers would like to remove the fence around the stadium and parking lot for local residents to walk or bike through the property to areas of commerce without having to walk a long way around.

Response P522-3 As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed

Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment P522-4 The property could be better incorporated into the rest of Echo Park rather than keeping everyone out. Gondola would be more of the same: expensive, elitist, noninclusive, McCourt money-maker. No thanks.

Andrea Harrow, elysian park resident

Response P522-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P522-3 for discussion of how the proposed Project would provide a mobility hub at the Dodger Stadium property. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P523 – Kathryn Reno

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P523

Comment P523-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

My name is Kathryn and I've lived in Los Angeles since 2017 and there are so many projects that are more deserving of funds than something this ridiculous.

Response P523-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P523-2 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden fromthe community. Who is paying for this project? Will taxpayers be left holding the bag? Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

We never asked for this project.

We don't need or want this project.

Response P523-2 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which

provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P524 – Kathleen Rogers

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P524

Comment P524-1 I am writing to voice my strong opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This thing is a hideous eyesore. An unnecessary imposition on a cherished park. A money-making gambit that we should neither reward nor encourage.

Response P524-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P524-2 And if it is built despite the wishes of those living under it, what happens to this ugly mess after there's no more money to squeeze out of it, or after it fails or ages or becomes obsolete?

Response P524-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require speculation as to possible future

environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P524-3 I'm a Dodger fan. I hate the traffic into and out of Dodger Stadium. It's worst part of the stadium experience. But this stupid gimmicky thing is no solution.

Response P524-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P524-4 Build a giant parking structure. Set up more than one remote shuttle service. But don't build this useless, ugly boondoggle.

Response P524-4 Refer to Response P524-3 for an overview of the need for the proposed Project. As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than

the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment Letter P525 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P525

Comment P525-1 Thank you. I'm Phyllis, I live a block away from here. The gondola would fly over me and my neighbors. My house would face the mouth of the noisy Broadway junction, a 98-foot tall turning station. I think you've seen how this hearing is not right, the way they are taking public comment. It's been like this since the beginning, trying to hide and not let it get out how horrible this project is. This project is not for us. This project is for Frank McCourt, who is a developer. It's for their Olympics, which is for developers. It's for politicians who are in the pockets of developers. Frank McCourt wants to build right over us, 40 feet over my neighborhood, as if we're nameless faces. But we're not. We're a real community. I'm glad my sister and my neighbors are here tonight as well as all these residents and supporters in a larger community. It's really great to see people show up for each other and speak out. There have been so many lies about this project from LA Art, but we know what this project is really about. Frank McCourt wants to build a giant complex up on the Dodgers Stadium parking lot. It's not a secret!

Response P525-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant, including at the Broadway Junction.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done

by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR. After the protesters left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other

applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P525-2 If he had a permanent transit stop that would give him incentives to build bigger and bigger and bigger development there.

Response P525-2 Refer to Response P525-1 for discussion of how the proposed Project solely proposes an aerial gondola system.

Comment P525-3 This project makes no sense for transit. At max capacity, it can only handle a fraction of the Dodgers Stadium attendance, and how do you think they're getting to the gondola? Driving, most of them. You're only saving the last 1.2 miles!

Response P525-3 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P525-4 Maybe some will take transit, probably the same people who would take the Dodgers Stadium Express, which we support. Let's support expanding and electrifying the Dodgers Stadium Express! That'll enforce bus lanes, more bike lanes, better sidewalks, and an escalator up the hill for pedestrians.

Response P525-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P525-5 Not this boondoggle gondola! It doesn't help traffic. It doesn't connect us to parks or transit. Those are lies. What it does is turn Chinatown into Dodgers Stadium's parking lot. It takes away, it takes away parking for businesses! It increases noise, with this gondola running constantly, 18 hours per day, 6 a.m. to 12 a.m., not to mention the invasion of privacy!

Response P525-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at

LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, operational noise impacts would be less than significant.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the

privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P525-6 This gondola mows down the entrance of LA State Historic Park. That's our space. The whole point of the park in a city is for people who live in a dense urban environment to get away from all that and to have some peaceful enjoyment in open space with open skies. It wasn't so that Frank McCourt could fly five-ton metal cabins 26 feet over our heads.

Response P525-6 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P525-7 No gondola! No gondola! You know what? McCourt wanted to divide us, in my neighborhood, buy us out, buy some of my neighbors out, so that we would quietly go away. He wanted to fly under the radar with this project, keep everything hush hush, and get the project approved before anyone knew what was going on. You all remember in 2018, they said it could be running by 2022. Remember? My neighbors and I never even had a chance to say anything about this project going on our neighborhood.

Response P525-7 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment raises

issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P525-8 Now, Climate Resolve is putting their greenwashing slime all over it. It's disgusting. I still hear some people say, "Oh, but the gondola would be so great. It would be iconic!" Yeah, it'll be iconic all right: an iconic monument to injustice.

Response P525-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project supports Metro's goal of prioritizing equity opportunities and helps promote public transit as an essential lever in enabling access and improving quality of life for Los Angeles County. The Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Further, public outreach for the proposed Project was designed with

environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P525-9 We're here to call it out for what it is: a scam, a sham. If you're standing up and supporting this, you need to wake up. You're teaming up with Frank McCourt who bankrupted the [inaudible]. You're teaming up with those who erased the original Chinatown and evicted the residents of La Loma, Bishop and Palo Verde to build Dodgers Stadium. You're choosing dark side of history. You really don't have to. I know this gondola sounds good at first in theory, it's like, oh, it'll be so cool and fun, but there's a whole lot more to it. Some people, I think a lot of people, ones who aren't greedy bastards, do come around. But we need everyone's help. So, thank you for being here. We can do this together. Stop the gondola!

Response P525-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P526 – Gabe Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P526

Comment P526-1 *Gabe:* Yeah, what's up? I'm Gabe, I'm born and raised in Elysian Park, just right here. All right, so, I remember growing up, there were basically no sidewalks in Elysian Park, so the suggestion that you could take the, whatever this is, up to Elysian Park and then walk around is pretty absurd.

Response P526-1 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, and mobility hubs. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment P526-2 This is very clearly a very, all right, no, wait, let me back up. I want to explain something that I feel like none of these posters are going to explain, or they're actively lying about. There are only 82 games, like one of the ladies up here explained. There are only 82 games in the year, which means this would only be running for game days, so I guess 82 days of the year. That leaves 283 days of no game day service. Do you think that this would not be used during those 283 days? What instead this is, this is not a public service. This is part of building infrastructure so that Dodger Stadium can continue building its commercial resources and so that Chinatown is continually gentrified by these big developers buying up these buildings and then turning them into, basically, like empty rental spaces. No, because think about it, 283 days of the year that this is not used, that's not going to happen.

Response P526-2 Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodgers games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated

that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost the proposed Community Access Plan. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P526-3 The other thing is, there's a pie chart over there that is heinous. You really need to check it out if you see it. It says that 67% of the people using this are going to reach it through public transit. What they fail to mention on that pie chart, and they should have put it on the title because this is pie chart rule #1, this is, try making rule #1 that you put what the pie chart is on the title. They didn't do that, first of all. Second, that's wrong. 283 days out of the year, this will be used to funnel people in and out of Dodger Stadium. The people going to Dodger Stadium will be parking there. Most of Dodger Stadium, that's, like, 7 out of the 8 lots that form Dodger Stadium, are parking lots. That means people will be going there, parking there, and then coming in to these areas.

Response P526-3 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. The Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner without any agreement in hand is simply too speculative to require the analysis in the EIR for this aerial gondola system.

Comment P526-4 This is not a public system. This is being paid for by the owners of Dodger Stadium and by Frank McCourt. This means that they're going to want a return on their investment. Do you think that they're doing this for the good will of the people of Chinatown? No! Do you think they're doing it for the good will of the people of El

Pueblo? No! This is obviously something else. What's going to happen, and I'm not being conspiratorial here, this is literally in the works, they're not going to tell us. They're going to expand Dodger Stadium into an LA Live type commercial area. There will be no space for people to go in and rent those areas. That will be rented to corporate interest and corporate interest only. So, what's going to happen is we're going to have a mall at Dodger Stadium and Chinatown and these areas will be continuously developed as the project of Los Angeles currently is to expand downtown LA into the surrounding areas. You can see this on Sunset. 1-1-1-1, 1-1, four ones Sunset, all these buildings down here, they're continuously expanding, building commercial properties on the areas around it, areas that used to be and still are inhabited by people who work here, who live here, the normal people that live here. So, what this is, it's part of building commercial infrastructure, commercial retail, and I'm not having it. I don't want this, and nobody else wants this.

Response P526-4 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P526-5 *Speaker 2:* Well put, well well put.

Response P526-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P527 – Kris Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P527

Comment P527-1 *Speaker 1:* [inaudible] this is the biggest bullsh*t I have seen. Now [the next] speaker is Kris. All right, let's go, let's go!

Response P527-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P527-2 *Kris Chan:* Today, we are all at the biggest sham that I have ever seen, [calling us] a f*cking open house.

Response P527-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meetings were staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who had set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public

meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P527-3 You pieces of sh*t and [inaudible] you're acting like you can't hear us? F*cking hear us! We are here! We are not going to stop! You will f*cking hear us, because [this is our home]! We live here! You cannot f*cking step all over us as if we are f*cking insects! We [inhabit] this place! We will not move! [I assure you,] nobody f*cking wants this stupid box! In the f*cking air! [inaudible] [looking at me!] Stop pretending we don't exist! We are here! We are alive! And will f*cking make sure this f*cking gondola is never built! [Inaudible] So many [deaths] have been because of gentrification! [Rest in peace], [no availability] for the community, and it's all on your hands. You are murderers if you continue this project! Stop the gondola! Stop the gondola!

Response P527-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P528 – Katie Wang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P528

Comment P528-1 *Katie Wang:* Thanks Kenny. I'm Katie, I'm also with Chinatown Community for Equitable Development, where some of us here are also from. I've been a volunteer with CCED for around 10 years now, and when I first heard about this project, I thought, you know, our organization has been fighting for things that we really need, like a hospital, an active, an active working hospital that's open and accessible to our community. We've been fighting for a full-service grocery store. There are many things our community needs, and a gondola that hangs over our community is not one of them.

Response P528-1 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P528-2 We're asking for an investment in real public transportation, a resource, a resource that everyone can access. And maybe you're familiar with Chinatown, with this neighborhood that this gondola wants to be hanging over. You know, many folks are living at the poverty line. Many folks are working class and poor. It is not accessible to folks who live here to pay upwards of $20 for a gondola trip.

Response P528-2 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first / last mile multi-modal options at

the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P528-3 This is not the kind of resource our community needs, and we will continue to demand that this project be stopped.

Response P528-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P529 – Kenny Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P529

Comment P529-1 Hey, how's it going? It's Kenny, I'm with CCED. When I came in today over at the front desk to check in, and I asked them, "Where do I go sign up for public comment?", they pointed to the back corner of the room, with a freaking curtain behind it. Does that sound like public comment to you? So, we brought public comment here today, the people did, right? And I still see all these people, all these locals out here like at the science fair, looking at the little billboards, staring, and ignoring us. Here they are, whatever BS consulting agency you work for, Governor, whoever's here, you over there in the corner looking nervously around, you should be here, listening to us!

Response P529-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of format of the in-person public meetings immediately preceding and during the Draft EIR public review period, which was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity.

Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion.

Comment Letter P530 – Elba Yanyez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P530

Comment P530-1 *Speaker 1:* The Gondola is not good for Chinatown, it's not good for the state park. Now we have somebody from the state park [who's] going to say a few words.

Response P530-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments P530-2 through P530-3. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment P530-2 *Elba Yanyez:* Hello everybody. My name is Elba Yanyez. I'm an El Sereno resident and I'm with Save Elephant Hill. For seven years I served on California's state commission on parks and recreation. During the time that this park was under development, community members undertook one of the greatest environmental justice campaigns in Los Angeles history. It took an entire city to stop the development of warehouses and to create this park. Once that park land was protected, there were 65 meetings led by state park staff to determine what would happen on this land, and at no point during those discussions was there a mention of a gondola. Never.

Response P530-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and park amenities. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would

be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Through continued collaboration with State Parks and other stakeholders, the proposed Project benefits would outweigh those effects and would be a net benefit for visitors to the park. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment P530-3 This is a violation of our state law, CEQA, California Environmental Quality Act. This is a complete travesty. If this gondola gets built, not only is it a travesty of the law, but it's a travesty for all the work that people have put in for decades to get this park to what it is. It's not in the EIR; the gondola is not in the EIR. The impacts on the community of this gondola were never considered, so we have to stop the gondola, now.

Response P530-3 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan

for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter P531 – Xochitl Manzanilla

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P531

Comment P531-1 Speaker 1: We have Xochitl from [inaudible], which is an area affected quite a bit.

Response P531-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Responses to the comments contained in this letter are provided below in Responses P531-2 through P531-4.

Comment P531-2 Xochitl Manzanilla: Hello, good evening, my name is Xochitl Manzanilla, and I am opposing the gondola very strongly. Listen, Frank McCourt, because we don't need this gondola. This is a monstrosity that we don't need it, we already have transportation to Dodgers Stadium, and you are a billionaire, you only want to get more money from the people, who is poor people. So, the poor are poorer, and the rich are richer. You are already a billionaire; you don't deserve more from the poor people of these communities. You go make your gondola somewhere else because we don't need that.

Response P531-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project supports Metro's goal of prioritizing equity opportunities and helps promote public transit as an essential lever in enabling access and improving quality of life for Los Angeles County. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P531-3 We have many, many different problems in the park, LA State Historic Park, and we don't need that gondola because that will destroy all our programs. In the park, we have the farmer's market.

Response P531-3 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P531-4 We have a program with flying kites that are very high, they fly very high. With those gondolas, that program will not be possible. So, we have to stop this monstrosity as soon as possible, so listen Frank McCourt, and stop it, stop it right now. We don't need it. Stop the gondola! Stop the gondola! Stop the gondola!

Response P531-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P531-3 for discussion of how the ability to use the vast majority of the Park would not be affected by the proposed Project, including kite flying. Refer Response P531-2 for discussion of the Project Sponsor.

Comment Letter P532 – Tam Po Tien

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P532

Comment P532-1 *Speaker 1:* That is, many thanks.

Response P532-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P532-2 *Tam Po Tien:* I am Toishanese, let's speak Toishanese.

Hello everybody, we the Toishanese, [inaudible] 1 2 3!

Let's unite!

To oppose that gondola!

I don't know what else to say. That's it.

Response P532-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P532-3 *Speaker 1:* She spoke in Toishanese. [She said:] oppose, unite, and organize! Oppose the gondola!

Response P532-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P533 – Jose Estrada

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P533

Comment P533-1 *Speaker 1* [inaudible] this project is opposed by a lot of people. The next one is Jose.

Response P533-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Responses to the comments contained in this letter are provided below in Responses P533-2 through P533-4.

Comment P533-2 *Jose Estrada:* Ok, good evening to all of you. My name is José Estrada, I am a Resident Community Organizer here in the area, and the truth is that as a representative of the Hispanic, Spanish-speaking community, we, as low-income families, know that these projects are not advantageous to our communities. We have many examples in Los Angeles, where right now many Hispanic communities are being evicted because of these false projects, like the Gondola Project.

Speaker 3: Hello, my name is Jose Estrada, I'm a community organizer and I live in the area. As a representative of the Spanish-speaking community in LA and of all the people in the community we work with, we know that these projects are a false promise and only lead to gentrification, one of many projects in LA that is not good for our community.

Response P533-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P533-3 *Jose Estrada:* We cannot accept that for the sake of money people are being deceived and being told to accept the project. There is a community nearby called William Meek: 420 homes, 420 families that have been forced to say that they accept the project by intimidating them, by telling them that if they do not accept the project, they will be evicted from their public housing. This must not happen: that through money people are being harassed and lied to. Because afterwards, the problem is that many families will be evicted from this area. Because, as we say, these projects are

very expensive and they are for touristic purposes, and what this brings is more evictions, evictions of many families from this area.

Speaker 3: We can't allow poor people to be scared by money. One of the communities that we work with here in Chinatown, [inaudible] Gardens, is a public housing community. It's got over four hundred units. People there have been forced to say that they agree with the project when all we know is that people are afraid. They're being intimidated, they're being scared when this is only going to lead to further displacement.

Response P533-3 Refer to Response P533-2 for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment P533-4 *Jose Estrada:* Well, finally, we are grateful because, as they say "Together, everything is possible." The Korean, Chinese, Hispanic, English-speaking communities, from all languages, all cultures, are gathered here. We are very glad that we are united in this fight! Because we have to stop this project. Because if we don't stop it, we will regret it afterwards, so thank you for being here! Together, fighting, saying "Stop Gondola!" Let's stop the Gondola Project! Thank you! Thank you very much!

Speaker 3: [A lovely], I want to thank everyone who's here. As you can see, we have a very diverse community in Chinatown, and people are all coming together to stop this project. Together, we can build [inaudible] and stop this project so that we don't regret the aftermath that's going to happen if this gets approved. Thanks everyone and [stop the gondola!]

Response P533-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P534 – Amy Ho

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P534

Comment P534-1 Hello, good evening, ladies and gentlemen. My name is Amy. I've been living here for 35 years, and I have worked hard, just for, you know, to get a place to live, right? And I'm very happy that, you know, I'm not a burden to the city or to the government or to the society. I worked hard to get my piece of land and home to live here.

Response P534-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P534-2 Not [the] Dodgers; they don't have to take away my right to live at [inaudible]. Besides, the Dodgers play, the games is only 82 or 83 games per year out of 365 days. Why [do] they make a big deal about that? Okay. Well, for those who approve the Gondola, please, touch your heart, and, you know, your conscience. If someone put a gondola in front of your house and had to [inaudible] over your head, over your roof, would you think? Would you approve with your hands and legs for that? Think about that, always put yourself, someone in your position and yours in other position before you say something. You know what the Dodgers [inaudible] is always think about? Their money, their revenue, how much they make per cup of beer, per cup of coffee, or cup of Coke. They're not [looking out] for us here.

Response P534-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents,

employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P535 – Melissa Arechiga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P535

Comment P535-1 Hi, my name is Melissa Arechiga. I stand here before you as a representative of the surviving families that were violently displaced for Palo Verde, La Loma, and Bishop. Three Mexican indigenous communities that were destroyed to build Dodger Stadium. I'm here today to oppose the gondola project, the [inaudible].

Response P535-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P535-2 While this may be exciting for some, it's a sign of change, and the change is not inclusive to all, specifically people of color. The Dodgers corporation and the City of Los Angeles have a long partnership together, working to destroy and exploit communities of color. The gondola represents gentrification, the destruction of not only our communities but the environment and our beloved wild fire. The gondola project is no different than the deal that was made to take away our families' generational wealth by destroying three communities to build the Dodger Stadium. The Dodgers and the Los Angeles City Council set to build the gondola in the middle of our communities, and this would only benefit the Los Angeles Dodgers.

Response P535-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets,

arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P535-3 Our residents and small business owners will suffer with this so-called revitalization project that is code word in communities of color as gentrification and long terms that leaves our most vulnerable community members displaced with no benefits. The history between the Los Angeles Dodgers and the City of Los Angeles has left our city in worse conditions than the deal in the 1950s, when our homes and our three communities were destroyed, and the lies that were told to the public of public housing today leave us with the current issues of our houses and unaffordability crisis that affect all of us today. It is a win-win for the Dodgers. It has been since Black Friday, Friday, May 8th, 1959, when our three communities were bulldozed, and our families dragged out. It is time to put a stop to the Dodgers corporation on exploiting the people and public. [inaudible] elected officials oppose this project as it will have damaging effects that will have lasting effects for generations and generations. Enough. It's time to put an end to Dodgers' corporate greed.

Response P535-3 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Response P535-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment Letter P536 – Victoria Steele

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P536

Comment P536-1 I live... I'm actually in Chinatown Senior Lofts [inaudible] right on the gondola line, and we have [a] recreation area on the roof. And we are concerned about privacy and, although I've been told that the windows will fog up, [that] there's no problem, we can't really trust that 100% that, that's going to work and continually work. We do not like a loss of privacy for any residential area.

Response P536-1 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P536-2 Also, we're concerned about the traffic, the parking. All the traffic is going to be on our [meter]. Parts of Chinatown have all these small streets. It's already congested enough; we don't need any more then that.

Response P536-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a

transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P536-3 And, it's a concern too about the park. Should we... Is it really wise having a station in Chinatown? Will that increase parking problems for traffic or are people going to go to Union station and park down there? And visually, how is that going to affect the park?

Response P536-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Response 536-2 regarding the Parking Study and parking management plan. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park.

Comment Letter P537 – Julie Chow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P537

Comment P537-1 *Julie Chow:* Good evening, everyone.

I'm Julie Chow, and I have lived in Chinatown for many years.

I'm strongly opposed building this gondola.

Speaker 2: [My name is] Julie Chow, I've [lived] in Chinatown for many, many years, and I strongly oppose the gondola project.

Response P537-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P537-2 *Julie Chow:* This approach is really disrespectful to the Chinese community.

Speaker 2 The gondola is very disrespectful to the Chinese community. [inaudible]

Response P537-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Further, the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P537-3 *Julie Chow:* If they really need it, they can build a subway, a bus.

Response P537-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-

capacity transit connectivity in the Project area. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P537-4 Let's oppose it together, we will not support it, always oppose it!

Speaker 2: Together, we oppose the gondola, forever!

Response P537-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P538 – Li Wei Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P538

Comment P538-1 *Li Wei Huang:* We are strongly opposed this gondola project.

We will not sell Chinatown.

Speaker 2: Oppose the gondola. Do not sell- - Chinatown is not for sale.

Speaker 3: Chinatown is not for sale!

Response P538-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P538-2 *Li Wei Huang:* Chinatown is our home

Speaker 2: Chinatown is our home

Response P538-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P538-3 *Li Wei Huang:* If this gondola project proceeds, there is only harm, but no benefits.

If our voice can be heard, they should build the gondola near the park.

Do not pass through Chinatown, right?

Speaker 2: We don't want a gondola. We don't want a gondola [to] pass through Chinatown. Okay.

Response P538-3 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P539 – Ne Huang Hom

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P539

Comment P539-1 *Speaker 1:* We're going to have a resident from Chinatown, they speak in Chinese.

Response P539-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P539-2 *Ne Huang Hom:* Strongly oppose this gondola project.

Our Cathay building has hundreds of residents opposing this.

Speaker 1: He is [a resident of] Cathay Manor, senior citizen housing, he says he strongly opposes the gondola project, and the people, 300 residents of Cathay Manor oppose the gondola.

Response P539-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P539-3 *Ne Huang Hom:* We are strongly opposed this gondola project, it is a scam.

Our customers, large and small businesses will be scammed.

It will screw up our Chinatown. It's dirty and polluted. Tall buildings can't be built here.

This gondola will create more harm than good, we are opposed it.

Speaker 1: [inaudible] no good for the Chinatown community, it's not good for the China community. [inaudible] low-income residents, [and this will cause] more air pollution, [lack of] privacy, so we oppose!

Response P539-3 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local Chinatown businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project

alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views.

Comment Letter P540 – Alejandra Flores

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P540

Comment P540-1 I am AGAINST this proposed gondola monstrosity being built NEXT TO MY HOUSE!!!!

Response P540-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential uses.

Comment P540-2 Our community didn't ask for this project.

Response P540-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P540-3 OUR COMMUNITY DOES NOT WANT OR NEED THE GONDOLA. NO ONE in this neighborhood is "for" this horrible structure. NO ONE!

Response P540-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P540-2 for discussion of the proposed Project's outreach efforts.

Comment P540-4 Whatever it is - We say "No!" NO GONDOLA. EVER.

Response P540-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P541 – Bob Hanisee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P541

Comment P541-1 In response to your article re the proposed gondola from UnionStation/Chinatown to Dodger Stadium. If one makes the unlikely assumption that traffic on the gondola is as projected, where will all the cars/users park? The only real parking structure available is on the back side of Union Station. Imagine if you will several thousand folks trying to get into and then after the game out of that facility. At the same time, Dodger Stadium has a wonderful parking facility/lot that is, though sticky at game time works adequately.

Response P541-1 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of how the proposed Project would require the removal of 194 parking spaces at Dodger Stadium to accommodate Dodger Stadium Station, but approximately 20 percent of Dodger fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P541-2 Yes, there is an increase in traffic at all the Stadium entrance points and surrounding streets (a social price worth the cost for the benefit of having the Dodgers in our city).

Response P541-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's

regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P541-3 And what then of the six to eight months during the off season? After building this monstrosity,all that would be accomplished is to shift the congestion to new locations.

Response P541-3 Refer to Response P541-2 for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated “vehicle miles traveled” as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations.

Comment P541-4 This is clearly a vanity (and money making) project for/by Mr McCort: it is not needed

Response P541-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P542 – Kimberly Turner

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P542

Comment P542-1 *I oppose the Los Angeles Proposed Aerial Gondola to Dodger Stadium. *Gondola's will "fly" over communities in the area at low altitudes. These communities will suffer severe negative impacts including loss of privacy and cluttered airspace above their homes. This is yet another LA tourist attraction/moneymaker for the developer/owner while disregarding the negative impacts on the communities below. Residents are at your mercy, with no control.

Response P542-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P542-2 *This proposed Gondola Project will sacrifice communities* and, like FAA's NextGen, will not meet the objectives. According to a *UCLA study attached*, the Gondola Project would not significantly reduce traffic around Dodger Stadium, will not reduce greenhouse gas emissions, will carry fewer passengers than LA ART claims, will not likely be used after the games, and will unlikely be used for any transportation aside from the games. There are easier, faster, and better ways to meet the objectives, such as making better use of existing bus lanes.

Response P542-2 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab

Study:

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
Jiaqi Ma
Director, UCLA Mobility Lab
Faculty Associate Director, UCLA Institute of Transportation Studies

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd).

Comment P542-3 *The Gondolas will be using "mobility hubs." * Will this new hub have other purposes, for other modalities such as Advanced Air Mobility/Urban Air Mobility ("AAM/UAM")? *It's impossible not to draw the parallel between the Gondolas and AAM/UAM. *We have found that under former Mayor Garcetti, Los Angeles is being sacrificed as a test city for these new transportation modalities, that are little more than "taxis" holding only 2-4 people, flying at disturbingly low altitudes (350 feet AGL), serving only high-income users, and will not reduce freeway traffic. It will be a money maker for aviation industry insiders at the expense of the* communities below who will be subject to extreme impacts *stacked underneath NextGen jets and helicopters. *Unsuspecting sacrificial communities are left out of this process* until it's years in the making by private industry partnered with LA's policy makers/leaders, and too late for the public to put a stop to.

Response P542-3 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station to provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/ last mile multi-modal options. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment P542-4 As a community activist in Studio City, for years I have been requesting information about AAM/UAM development in Los Angeles, only to now find that it is in advanced stages and ready to infiltrate our skies by 2024/2025. Former Mayor Garcetti/Metro/LAWA have been pushing for AAM/UAM progress, while the public remains ignorant of what lies ahead if they happen to be one of the "unlucky ones" under a flight path, or in this case, under a gondola. I have seen first-hand how citizens are shut out of the process --their requests for information about safety, environmental impacts, andcosts are left unanswered. *The human cost has been ignored in favor ofmonetary gain. *

Response P542-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or

raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P542-5 LA leaders must start listening to the people. The desire to make a buck can't be greater than the interests of the people you serve who call LA home. Find a better way to get people to Dodger Stadium. *Stop the Gondola and Stop AAM/UAM before it's too late. *

Response P542-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P543 – Brenda Zhang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P543

Comment P543-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a resident of Atwater Village who works with Chinatown community, I am against the project because it continues a racist history of neglecting and inflicting upon the communities most impacted gentrification and displacement, environmental hazards, and and overburdening of already limited resources (around traffic, parking, and so forth). These communities did not ask for this project, and we don't need or want this project.

Response P543-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, and how the proposed Project would address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment Letter P544 – Chrysa Kovach

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P544

Comment P544-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As someone who works in the community, I am greatly concerned about additional traffic strains in the neighborhood. This gondola project does not solve existing transportation issues and will only exacerbate already poor air quality and displacement in the neighborhood. Nobody asked for this. There are myriad other issues that we have in Los Angeles that could use the public discourse, resources, and focus of Metro that has been wasted on this superfluous and frankly ridiculous project.

Response P544-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P545 – Jane Chow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P545

Comment P545-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a resident of Los Angeles, I will be negatively impacted by this project. I am concerned about this project for the following reasons:

Response P545-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Responses to the comments contained in this letter are provided below in Responses P545-2 through P545-5.

Comment P545-2 1. Environment: The Gondola Project will increase the impacts of air pollution from traffic and vehicle emissions in an area already overburdened by air emissions and pollution.

Response P545-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P545-3 2. Historic and Cultural Resources: This project will hinder historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P545-3 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P545-4 3. Gentrification: This project will lead to displacement and increase the cost of rent in the area.

Response P545-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding

neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P545-5 4. Lack of transparency and community consultation: Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

The community has been neglected and our people's voices have not been heard. Please do not go forward with this project.

Response P545-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Nevertheless, this comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P546 – Phyllis Chiu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P546

Comment P546-1 I am a Chinatown stakeholder and I am opposed to the Dodger Stadium gondola project. The gondola will serve no useful purpose to Chinatown residents and businesses. Most Chinatown residents do not regularly attend games or concerts at Dodger Stadium. The gondola and its towers would take up airspace in the community and nearby state park, which residents use for exercise and fresh air. It would do nothing to increase business and tourism in Chinatown, since passengers would fly right over the community.

Response P546-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Additionally, refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of

the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P546-2 Dodger fans presently can conveniently go from Union Station to the stadium on the direct Metro buses provided on game days. Residents and tourists already have transportation access to Chinatown via the Gold Line stop. What residents need from Metro is more frequent and reliable bus service so they can go shopping, to doctors's appointments, etc.

Response P546-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Further, compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P546-3 While your literature makes it look like a wonderful benefit built and supported by private funds, it is unclear where operating expenses down the road will come from. It would be improper if public space and public subsidies are being used to benefit private ventures while the city and Chinatown are in need of affordable housing, health care, social services.

Metro, as a public agency, needs to get its priorities correct. You are supposed to serve all the residents of the area, not manage wealthy individuals' vanity projects.

Response P546-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment Letter P547 – Andrew Yip

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P547

Comment P547-1 As a Dodger fan, and Metro transit rider, I am voicing a big NO to any Gibson's bring built to connect Union Station to the stadium at the expense of local residents.

Make transit free and reliable instead of building costly projects that won't appreciate traffic.

Response P547-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment Letter P548 – Renee Tajima

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P548

Comment P548-1 I am writing to express my deep opposition to the proposed Dodger Stadium gondola. My family has lived in the downtown and eastside community for a hundred years and we have witnessed and experienced many waves of displacement, as when our church and family home was lost to a freeway. At least I can say that freeway provides a service to the many. The gondola will serve the few, as the UCLA Mobility study has shown.

Response P548-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Comment P548-2 I've been saddened to see longtime residents and businesses pushed out of Chinatown. The community is no longer the same. The gondola would further degrade quality of life and increase environmental pollution in the affected neighborhoods, it would privatize public resources for the benefit of private interests Frank McCourt and the Dodger organization, and it would provide very little in traffic mitigation or responsible and practical public transit.

Response P548-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend

affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment P548-3 If you want to solve the traffic and parking problem at Dodger Stadium, then build and strengthen a safe, accessible and reliable public transit system.

Thank you for your attention to this matter.

Response P548-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset

Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment Letter P549 – Bridget McCarthy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P549

Comment P549-1 The DEIR is incomplete and inaccurate in fundamental respects. What are the ultimate plans for the Dodger Stadium parking lot? How will those plans impact traffic and greenhouse gas emissions? The data in the DEIR concerning number of car trips eliminated and impact on greenhouse gas emissions is flawed. It does not take into account that most gondola riders will take a rideshare or cab after the game and further that few (if any) will use the gondola on non-event days. This flaw impacts each and every statement in the DEIR on gondola ridership and greenhouse gas impact.

Response P549-1 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. The underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model, which took into account the share of game attendees at Dodger Stadium using rideshare/transportation network companies. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P549-2 The construction of a massive tower and station at State Historic Park is contrary to the park?s historical mission and its recreational usage. These unwelcome developments would detract from the refuge offered by the park and the park viewshed. The Broadway bridge can be constructed without the massive gondola. The gondola impact on park users and local residents within the ?flight path? Isprofound and the lack of concern for residents is callous and heartbreaking. One must ask whether Frank McCourt and Metro board members would welcome gondolas whizzing over their yards and homes every few minutes?

Response P549-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response F, Los Angeles State Historic Park, for discussion of the proposed Project's consistency with the park's historic designation. As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited

to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P549-3 The TSM Alternative is clearly feasible and superior yet it is discounted in the DEIR in order to present the gondola as the only solution to traffic and transportation issues. It is not the only solution. Express bus service can be increased. Just look at the Hollywood Bowl bus service. Loading stations can be added. No massive gondola is needed to move people around Chinatown, Solano Canyon and Elysian Park. Dash bus and Micro Metro services can do that much more efficiently and far less obtrusively. These existing solutions do not impact State Historic Park or El Pueblo. Take a lesson from the walkways that were built over Flower Street in downtown decades ago ? they are very lightly used while most people walk right down to the street to get to their downtown destinations.

Response P549-3 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also

incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. While services such other as DASH bus or Metro Micro services can and do serve the community, simply improving these services as an alternative would not address the objectives of the proposed Project to provide transit service to Dodger Stadium. The proposed Project would serve both Dodger Stadium and the surrounding communities. The proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P549-4 The gondola would use public rights-of-way and park space for transport to a privately owned stadium and potential future private development. This is wrong. Any gondola built in the City of Los Angeles should serve a broad public purpose, such as transport to employment centers, existing entertainment/cultural centers or major healthcare facilities. Moreover, the DEIR does not specify how gondola operating costs will be funded. Undoubtedly these costs will far exceed some revenues from some third party advertising. I object strongly to use of tax dollars to fund/support the proposed gondola.

Response P549-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the

intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.0, Project Description, for discussion of how Dodger Stadium is the largest MLB Stadium in terms of capacity and in addition to other MLB games, other special events are hosted at Dodger Stadium throughout the year. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park, and improve access to Elysian Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P549-5 Stop the gondola and focus Metro efforts on more humane, people friendly and less costly green transportation modes. And while you are at it, please get those shade structures installed at the bus stops. How can it be that Metro is focused on constructing a massive gondola for Frank McCourt?s private commercial development objectives while poor working folks are sweltering at bus stops?

Response P549-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed

Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment Letter P550 – Rehyan Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P550

Comment P550-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P550-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P551 – Samantha Eddo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P551

Comment P551-1 My name is Samantha Eddo. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I live and work nearby and frequently visit the LA State Historic Park to walk my dog and have picnics with friends. This park is on of the few green spaces we have in this area, and thus is a precious resource for our community.

Response P551-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P551-2 I am extremely concerned about the impacts this unnecessary project will have on the surrounding community, including but not limited to increased traffic, air pollution, view obstruction, displacement and increased rents. The community does NOT want this project, and it will ONLY benefit the Dodger franchise.

Thank you for hearing my concerns.

Response P551-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, while there are no designated scenic vistas present in the area of potential impact, the Project area provides views that are considered scenic by certain viewers, including the view of the downtown Los Angeles skyline, Los Angeles Union Station (LAUS), El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P552 – Jonathan Berman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P552

Comment P552-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Normally I approve of public transit projects, and as a resident of Solano Canyon this would reduce traffic right in front and behind my house... BUT... but this "gondola" seems like a real boondoggle.

Response P552-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P552-2 Hasty planning; a leader who has already had fiscal troubles with the Dodgers and the City; dubious outcomes in efficiency and safety; probable public bailouts; lots of physical and community issues here; and a possible end goals of freeing up private owned stadium parking lots for commercial use make the practicality of this a definite NO.

Response P552-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding,

recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter P553 – Roger Ly

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P553

Comment P553-1 My name is Roger and I am a resident of the City of Los Angeles and was raised in the Chinatown community where the LA Aerial Rapid Transit gondola is being built. I am a data analyst employed in the field of clean transportation and infrastructure so public transportation infrastructure is something I am passionate about. I'm writing to voice my opposition to the construction of LA ART to Dodger Stadium for the following environmental reasons.

Response P553-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Responses to the comments contained in this letter are provided below in Responses P553-2 through P553-5.

Comment P553-2 1. The construction of the LAART Gondola will be more environmental impactful than other alternatives such as Zero-Emission (ZE) bus mass transit and contribute noise and air pollution to the community. Metro already has a ZE fleet of busses and the successful Dodger Stadium Express program to provide green transportation to the stadium.

Response P553-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P553-3 2. The LAART DEIR does not consider the fact that people will drive and park in Chinatown to take the gondola instead from the LA Historic Park Station (where there is free parking) instead of taking public transit to LAART. This will increase the amount of automotive emissions to the community.

Response P553-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. The underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data.

Comment P553-4 3. Existing public transit infrastructure exists with the Dodger Stadium Express that connects union station and south bay to Dodger stadium. In the DEIR, the purpose of LAART is to connect public transit riders to Dodger Stadium. The existing infrastructure that is already established and successful invalidates the purpose of constructing the gondola other than the novelty aspect. The ZE bus fleet used in the Dodger Stadium Express would also be used daily on other routes while the LAART only has one route that would only be used during the 80-90 days that the stadium is used for home games.

Response P553-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an

enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P553-5 These were the 3 biggest issues I had on the environmental impact of the gondola that the narrative of the DEIR does not emphasize. From my reading of the DEIR, it is not an objective and unbiased environmental impact report but rather a report that uses the guise of net-zero carbon emissions and clean transit to push a private development project that will mostly used for novelty and tourism. I would be extremely unsatisfied and disillusioned with Metro if the construction of the LAART begins. I hope you take my comment along with the community's opinions into

consideration prior to your decision with LAART. Please reach out to me through email for further discussion or with any questions. Thank you for your time.

Response P553-5 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P554 – Will Cepeda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P554

Comment P554-1 I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium. The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Response P554-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P555 – Buck Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P555

Comment P555-1 This message is to express my opposition to the LAART Project (The Gondola). There has been little community input and comment on the project. When given the opportunity, people and organizations in Chinatown, Lincoln Heights, and the surrounding area express that the Gondola will hurt the community. It is doubtful that it will transport large numbers of people for Dodger games and for concerts.

Response P555-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice. Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[2] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's capacity to carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger

[2] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P555-2 In fact, it is likely to bring more traffic and congestion into the Chinatown area. It is no secret that Frank Court wants to start a giant complex development in the Dodger Stadium area. The Gondola is a step for development that will not benefit the residential and business communities of Chinatown and Lincoln Heights. It will lead to displacement and rent increase for local businesses and residents. I oppose this project because it will hurt the local residential and business communities.

Response P555-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability

features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P556 – Renee Pizana

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P556

Comment P556-1 As a Solano Canyon community resident, I am completely AGAINST the proposed gondola monstrosity being built in our beautiful and historic neighborhood.

Response P556-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P556-2 I am concerned about our neighborhood's historic infrastructure, our neighbor's privacy, our safety, and the public costs this project will surely cost.

Response P556-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the

vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station, and a separate operator would be stationed in a control room to monitor activity throughout the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P556-3 Our community didn't ask for this project. NO ONE in this neighborhood is "for" this horrible structure. NO ONE!

Response P556-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P556-4 The project will require the use of public rights of way, public airspace, and public lands for the placement of multiple towers with suspended cars intended to move a few thousand people in each direction between Union Station and Dodger Stadium for games and events.

The plan for massive towers ranging from six stories (84 ft) to 13 stories (195 ft) in height - is frightening and ugly.

Response P556-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The

neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P556-5 *Our* neighborhoods will be forever changed.

Response P556-5 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P556-6 Operating at maximum capacity is equivalent to 42 shipping container-size gondolas flying over our neighborhoods. A recent poll shows 76% of Angelenos oppose McCourt's gondola. There is already a free bus shuttle that takes fans to Dodger Stadium.

Response P556-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to

achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P556-7 OUR COMMUNITY DOES NOT WANT OR NEED THE GONDOLA.

Response P556-7 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P556-3 for discussion of the proposed Project's outreach efforts.

Comment P556-8 Building a project of this magnitude when the Dodgers only have 81 home games a year and limited events is a waste of taxpayer dollars. What else is McCourt not telling us? Maybe planning on making Dodger Stadium a 365 day theme park? Maybe setting the stage for the Riboli Family to build their 900-apartment complex on our state park?

Whatever it is - We say "No!"

NO GONDOLA. EVER.

Response P556-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter P557 – Phyllis Muro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P557

Comment P557-1 I am opposed to the Los Angeles Aerial Rapid Transit Project. After researching what this project will entail, it is clear to me that this project will be detrimental to the affected city's communities, aesthetics, L.A. Historic Park, Union Station and Pueblo de Los Angeles Historic Monument.

Response P557-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to the Los Angeles State Historic Park, LAUS, and El Pueblo. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P557-2 I understand you did not conduct an open public process? This is unacceptable. Who is paying for this project? What is this project projected to produce in financial returns? Is any of that money earmarked fot the affected communities? Who is paying for this project? Who will pay for the maintenance of the completed project? Will taxpayers be saddled with this expense while private owners earn returns?

Response P557-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance

costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P557-3 Transportation researchers from the University of California, Los Angeles (UCLA) used a state-of-the-art transportation simulation based on a Nobel-Prize winning model and found that the gondola has limited impact -less than 1% - in reducing traffic on major roads around Dodger Stadium on the night of a sold-out game. They also found that far fewer passengers would likely get to the gondola via public transit connections than LA ART claims. Without reducing traffic and increasing public transit connections, the gondola does little to change our air quality and reduce greenhouse gas emissions.

Response P557-3 Refer to Response ML-1 in Topical Response O, Response to UCLA Mobility Lab Study discussing how the Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P557-4 This sounds like Chavez Ravine Part II.

Response P557-4 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P557-5 This Project is cloaked in secrecy, it is being done with no regard for the communities and people it will affect. The people of Los Angeles are tired of having no input where Big Money projects are concerned, even as they affect their quality of life.

Response P557-5 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P557-6 This sounds like a typical Fascist Project. Big Money talks and the people who actually live in the area suffer. There is seemingly no benefit to them, negligible reduction in traffic (in an already VERY heavy traffic area thanks to Dodger Stadium), desecration of cherished historical places, more damage to local streets, increased litter and more crime. This is happening all over this country, and it's unacceptable.

Response P557-6 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the

Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Response P557-3 for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment P557-7 I intend to write our Mayor and our Governor. I wonder if they've received any financial incentive to support this project.

Response P557-7 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P558 – Adrian Quezada

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P558

Comment P558-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

I, as a resident who is sensitive and cares about sustainability in our existing communities would disqualify the importance and emphasize the less-than priority of this project juxtaposed with the current suffering economy in the LA area. (Attention to the homeless crisis is one example of said suffering)

Response P558-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P559 – Catherine Sanford

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P559

Comment P559-1 My Name is Catherine.

I believe the gondola is not necessary.

It will cause more traffic and congestion

It will only benefit Dodger Stadium.

Spend that money on Hillside Villa instead!

Response P559-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical

Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P560 – Mary Ramis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P560

Comment P560-1 In my opinion it is nice tourist attraction but this an expensive. I don't want this to push through, in our situation regarding our status regarding our rent list so high, so this gondola is not sinatarle going on to Chinatown housing right now. We can be homeless, why the city have money to spend this big amount of money, why not help us to live. There's a lot of things that this fund can help people right now. I think this is taxpayer's fund money. No I do not agree to this gondola.

Response P560-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment Letter P561 – Benson Lai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P561

Comment P561-1 I have lived in Chinatown for decades, and I have lived at the Hillside Villa apartments for 34 years. I do not want this gondola to be built here. This will cost so much money when what residents really need is services, real public transit not just to watch baseball. We need affordable housing. As a senior, I cannot even use an air train, it is not useful to me.

Response P561-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment Letter P562 – Jennie Limaeya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P562

Comment P562-1 1. Aesthetically, it is ugly. What do you [UNKNOWN] gondola in big city

2. The cost of building will be definitely be more than $125m if you acct for [UNKNOWN]

3. Taxpayer should not shoulder the cost. If McCourt wants it, he has to pay for it.

4. How safe is the gondola? Just last year, gondola fell in Italy. Think about the [UNKNOWN] cost

5. Building the gondola will cause people to lost their houses. Where are you going to house the displace family

6. Who would use the gondola if there's no event? So it is a waste of resources when it can be use to help taxpayer

7. How come when rich [UNKNOWN] people, the city will spend your money but the citizen/taxpayer who are in low/average income, the city does not care

Response P562-1 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be

sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Topical Response J, Gondola Design and Operations, for discussion of how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit and stem components would be equipped with security features for system safety.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing.

Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would

convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P563 – Nieke Gaston

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P563

Comment P563-1 There is already a free bus shuttle that takes fairs to Dodgers Stadium.

So it is a waste of money

No real community input

It is dangerous for the community.

The gondola violates metros procurement and oversight process

There is no proof that we need gondola

Building a project of this magnitude when the Dodgers only have 81 home games a year and limited is a waste of taxpayers dollar.

Response P563-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including

Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown/State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-

season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P564 – Brenda Anohy Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P564

Comment P564-1 As a resident of Chinatown, and a lifelong Los Angeles resident, I condemn the LA ART Gondola. Gentrification in Chinatown and Los Angeles is rampant and the gondola will contribute to the displacement of the existing community of Chinese, Latin, and Black multigenerational communities. We see no substantial evidence that it will positively impact the environment. It will contribute to traffic congestion in the surrounding Chinatown and surrounding Union Station. We not not have any knowledge of the private investor or his motive to build in Chinatown. Residents used to be educated about the prevalent issues concerning our housing and access to markets, and hospitals.

Chinatown speaks up!

Response P564-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Additionally, refer to

Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment Letter P565 – Janis Yue

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P565

Comment P565-1 Chinatown does not need a gondola. In a city with the most severe housing/homelessness crisis in America it is an absolute tragedy and shame that the city is choosing to prioritize this gentrification project that has absolutely no benefit to normal, working class people. I would never pay $30 to ride the gondola. This is further prioritization of transportation when the city should instead be prioritizing increasing public transportation and supporting affordable housing instead of projects like there which will only exacerbate the terrible housing crisis.

Response P565-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment Letter P566 – Gordon Lai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P566

Comment P566-1 As a long-time community member of Chinatown and Los Angeles, we do not need this Gondola

Response P566-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P567 - Marina

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P567

Comment P567-1 I do not agree with the Gondola Project because it is not good for the environment, it will cause a lot of problems.

Response P567-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter P568 – Jacob Woode

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P568

Comment P568-1 ¡No Gondola!

We don't want this. This is for rich people.

Response P568-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P569 – Victoria Steele

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P569

Comment P569-1 I am concerned about the financing and the ability to carry through with the promises being made. Specifically, the implementation and repair of clouding the windows to preserve privacy for people living in houses and apartments along the route and maintaining the the fare equal to that of the buses and use of TAP card. Once this is built, these things can fall to the wayside.

How many people would to use this and how often? The cost will have to be kept low which may require the shifting of money from bus or rail service to the gondola. This route is so small and affects so few people and the cost is high that the project does not seem worthwhile.

How many riders are not able to get on the current buses? Can the addition of more buses solve the need? Is there room to add a bus lane to speed up the service?

Response P569-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response B, Ridership Model; Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct

transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Given the capacity of the proposed Project's system, approximately 20 percent of Dodgers fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment Letter P570 – Khinn Ung

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P570

Comment P570-1 I HAVE LIVED IN CHINATOWN FOR (17) SEVENTEEN YEARS. A LOT OF CHINATOWN HAS BEEN DESTROYED BY DEVELOPMENT THROUGH THE YEARS. TRAFFIC TAKES A LOT OF TIME OUT OF MY DAY TO GET HOME. THIS GONDOLA DEVELOMENT WILL ADD MORE ISSUES BECAUSE PEOPLE WILL PARK IN CHINATOWN TO GET ON THE GONDOLA VIA UNION STATION. IF THIS PROJECTS WILL TRANSPORT 5,000 PEOPLE PER HOUR THIS WOULD MEAN MORE TRAFFIC WOULD FUNNEL INTO CHINATOWN.

Response P570-1 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment Letter P571 – Oralia Barrios

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P571

Comment P571-1 I am rejecting the Gondola project. This will affect me personally. I have a parking space at the bottom parking lot. Obviously the parking structure would be gone. Then the park would also be impacted. I live by alameda street the the gondola will pass by my apartment and looking in side it with no privace. The noise will increase and more pollution to our environment

Response P571-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Regarding the comment that the parking structure would be gone, the proposed Project does not include removal of a parking structure. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with

privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts would be less than significant. Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for discussion of the proposed Project's ability to improve air quality through reduced emissions.

Comment Letter P572 – Charlemae Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P572

Comment P572-1 I'm writing this in my concern for the placement of the Gondola. We are living in Chinatown on Alameda. Currently, without the Gondola the traffic and pollution is very bad. The traffic and crime is [illegible], and is horrible. Dodger Stadium already creates terrible traffic problems. People are walking the street all day and night. 5000 people per hour is too much, and buses is a unrealistic solution. Looking at the projected map, there will be 2 [illegible] support tower surround our residential area. We will, as resident have no privacy and security. Please reconsider the LA ART Gondola in our residential area.

Response P572-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Additionally, refer to Topical Response J, Gondola

Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted.

Comment Letter P573 – Ricardo S Haus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P573

Comment P573-1 It would cause a problem between ground people and the gondola people. They might think we're birds instead of people. It will start a war.

Response P573-1 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment Letter P574 – David Chueng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P574

Comment P574-1 Stop the Gondola

Response P574-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P575 – Tiang Liu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P575

Comment P575-1 Stop the GONDOLA

Response P575-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P576 – Lydia Rebecca Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P576

Comment P576-1 As a tenant/resident living in Chinatown, not to mention, being a disabled senior, I struggle in the current situation to find parking near my building. Additionally, the foot traffic near my residence is already loud and sometimes rowdy and frightening.

I have noticed that the existing traffic issues caused by Dodgers fans be it parking, eating at local restaurants is already quite heavy on the play dates. I'm only imagining now what that is going to mean to our park with hundreds more people "trampling" though our neighborhood. I believe in business, local business benefiting from the additional profits they may gain. However, having worked with in community activism in Boyle Heights and East LA. I have seen what occurs when gentrification occurs. Its very sad and disturbing to see the neighborhood change and destroy families and communities.

Please hear our concerns. Please keep Chinatown as it is.

Response P576-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to a proposed Project's stations. Additionally, refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical

Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment Letter P577 – Teri Vanderberg

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P577

Comment P577-1 I am resident at the metro which is affordable housing for seniors. The gondola will affect our current living situation. This area will become an affluent crowd and ruin the park, the citizens of Chinatown which is a historic part of Los Angeles history, where will be forever changed.

No parkin

Pollution

Crowds

Corruption

All for a Dodgers game! Make no sense it's only for money and greed

Response P577-1 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on

page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P578 – Sien Ank Mac

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P578

Comment P578-1 I strongly oppose the Gondola

Response P578-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P579 – Jin Tian L

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P579

Comment P579-1 I oppose the Gondola passing through Chinatown, which will bring air pollution and noise.

Response P579-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts from the proposed Project would be less than significant.

Comment Letter P580 – Yau Hing Leung

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P580

Comment P580-1 We are from Chinatown, and we oppose the Gondola passing through.

Response P580-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P581 – Kit Ma Yge

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P581

Comment P581-1 I oppose the Gondola passing through Chinatown

Response P581-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P582 – Yu Fen Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P582

Comment P582-1 I oppose the Gondola passing through Chinatown, which will bring air pollution and noise.

Response P582-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts from the proposed Project would be less than significant.

Comment Letter P583 – Cheng Yee Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P583

Comment P583-1 1. The gondola will increase gas emissions and air pollution.

2. The future financial losses will be borne by the American taxpayer.

3. The gondola will endanger the shops and residents of Chinatown below.

Response P583-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project.

Comment Letter P584 – Ellie Tham

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P584

Comment P584-1 1. I oppose the Gondola.

2. I oppose the noise pollution of Chinatown.

3. I'm opposed to the future financial losses, which will be borne by the taxpayer

Response P584-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts from the proposed Project would be less than significant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P585 – Lam Ngoc Anh

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P585

Comment P585-1 We are the residents of Chinatown and we oppose the Gondola passing through, which will bring air pollution and noise.

Response P585-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts from the proposed Project would be less than significant.

Comment Letter P586 – Rosario Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P586

Comment P586-1 This money you want to use in this project shall be spent on what our community needs! A market, a hospital, laundry facilities, and affordable housing. And to buy Hillside Villa

Response P586-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety.

Comment Letter P587 – Nancy Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P587

Comment P587-1 The city has money for Gondola but doesn't have money for Hillside Villa you are think only for making money but your not thinking for low income people who really need help

Response P587-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. The public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment Letter P588 – Melissa Reyes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P588

Comment P588-1 THERE ARE MANY MORE THINGS CHINATOWN NEEDS AND A GONDOLA IS NOT ONE OF THEM.

SPEND THAT MONEY ON A SUPERMARKET

SPEND THAT MONEY ON A HOSPITAL.

SPEND THAT MONEY ON HOUSING.

WHO THE HELL ASKED FOR A GONDOLA?

SPEND THAT MONEY ON THE COMMUNITY.

BUY HILLSIDE VILLA FOR EXAMPLE.

Response P588-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. Refer to Topical

Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process.

Comment Letter P589 – Monica Ruiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P589

Comment P589-1 This money should be used on people who cannot pay rent, like us at Hillside Villa, and other low-income buildings. Don't just help the rich, help the poor!

Response P589-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P590 – Casey Maddren

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P590

Comment P590-1 Cory Zelmer, Deputy Executive Officer

Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012
Sent via e-mail: LAART@metro.net

Re: Los Angeles Aerial Rapid Transit Project Draft EIR Comments

Dear Mr. Zelmer,

I'd like to submit the following comments on the Los Angeles Aerial Rapid Transit Project Draft EIR. I believe the DEIR is deficient in a number of areas, including, but not limited to Aesthetics, Cultural Resources and Geology. The project description is also problematic. My detailed comments are below.

Sincerely,
Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068

Response P590-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P590-2 through P590-11.

Comment P590-2 LOS ANGELES AERIAL RAPID TRANSIT PROJECT DRAFT EIR COMMENTS

Project Overview/Project Description

To begin, there are problems with the Project Overview and Project Description. The DEIR says that the Project will not only convey people to Dodger Stadium, but it will also serve the transit needs of area residents. Given the limited number of stations included in the Project, this is highly unlikely. The Chinatown/State Park Station is already accessible by the existing Metro Line 96 and by the Gold Line. To support its claim, the DEIR references gondolas being used for urban transit in La Paz, Bolivia, and Mexico City, Mexico. The Laz Paz Teleferico includes a number of lines that cover 6 miles and serve 26 stations. Plans are in place to extend it to over 20 miles. Mexicable covers three miles and serves seven stations. The proposed LA ART system is only 1.2 miles in length and has only three station stops, two of which are already served by existing lines. Even if LA ART were to assist in transporting fans to Dodger Stadium during baseball season, it's unlikely that transit riders would have much reason to use it during the rest of the year.

Response P590-2 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems

can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P590-3 The DEIR claims that:

"When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes."

The following paragraph says:
"The proposed Project would employ a Tricable Detachable Gondola system (also known as "3S"). 3S Gondola system cabins carry approximately 30 to 40 passengers."

If we divide 5,000 by 40, the answer is 125, so the DEIR seems to be saying that the gondolas will be making 125 one-way trips every hour. This means that a gondola will be leaving Union Station about every 30 seconds. This does not seem credible. First, the authors of the DEIR assume that every gondola will be filled to maximum capacity, which is unlikely. It's also unlikely that each gondola could reliably board 40 passengers every 30 seconds. The authors don't appear to take into account the realities of public transit and the various needs of its passengers, included passengers in wheelchairs, the visually impaired, parents with children in strollers, etc.. Beyond that, the authors' calculations assume that a minimum of 40 passengers will arrive and be able to gain access to the platform every 30 seconds. This is wishful thinking, not a realistic estimate.

Response P590-3 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds. The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd. To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for

discussion of the safety features of the proposed Project and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall of system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins allow for sitting or standing, and would be fully ADA accessible, including accommodating wheelchairs, and would also accommodate strollers. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data.

Comment P590-4 Aesthetics

The authors of the DEIR find that the Project will not have a significant adverse impact on scenic vistas or scenic resources. They conclude that:

"[T]he Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views. As such, operation of the proposed Project would not substantially affect scenic vistas or other panoramic views, and impacts would be less than significant."

Further stating:

"As illustrated in Figures 5-1 through 5-8 in Appendix C of this Draft EIR, the proposed Project would be consistent with Objective 4.2 of the Central City Community Plan related to the preservation of visual links to open space areas, as the Project would form a background feature and would not block views of open space areas. The Project design would also provide attractive transit services in compliance with the Mobility Plan 2035."

Though the Project may not impact designated scenic areas, it would be built in the oldest part of Los Angeles, a low-rise community filled with some of the city's most important cultural artifacts. The Project does not preserve visual links to opens spaces, and in fact, will obstruct views of open space in the historic core. The authors claim that the Project, with stations 173 feet long, 109 feet wide, and 78 feet high,

and towers 195 feet tall would merely be "a background feature and would not block views of open space areas." This is nothing more than the authors' subjective opinion, and many area residents have already let it be known that they disagree strongly.

Response P590-4 This comment provides a general recitation and characterization of the Draft EIR. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared.

Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR, for discussion of the impacts to cultural resources of the proposed Project, which would be less than significant with implementation of mitigation. As discussed in Section 2.4.1, Design, of Section 2.0, Project Description of the Draft EIR, the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. Of equal importance is the desire to minimize the perceived scale and mass of the stations and non-passenger junction, including the Alameda Station. As noted in Section 3.5.4 of the Draft EIR, visual alterations to the overall historic setting of the property where the proposed Project's Alameda Station would be located, including viewsheds, will be insignificant due to prior substantial alterations to the setting and will not impact the significance of historical resources nor their ability to convey their significance. As discussed in

Section 2.0, Project Description, of the Draft EIR, the proposed Project would connect open spaces and provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.

The Draft EIR's analysis of impacts to aesthetics was prepared by experts in their respective fields, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P590-5 Furthermore, the photos included in the DEIR under Aesthetics clearly do not give an accurate picture of the aesthetic qualities of the area. They seem to have been chosen to downplay the beauty of the historic core, and none of them capture the numerous scenic views that are available to residents and visitors. To correct the DEIR's deficiencies, I am including a few photos that I believe more accurately represent the area.

Union Station

Pico House, in the Central Plaza

Pico House, another view

Chinese American Museum, Los Angeles St.

Olvera Street

Chinatown, a view from Broadway

State Park and surrounding area from Chinatown Gold Line Station

A view of Gold Line Chinatown Station from Spring St

Response P590-5 Refer to Response P590-4 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including to scenic or panoramic views. As noted in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, identification of potential aesthetic and visual impacts included the identification of Landscape Units (LU) that defined particular viewsheds and/or aesthetic settings within the Project area, as well as Key Observation Points (KOPs) within each LU that are representative of the visual character of the area. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Visual simulations were created to showcase the pedestrian eye level vantage point within photographs and, as such, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Further, visual simulations were created to reflect the proposed project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared.

Comment P590-6 Related to the issues discussed above, the DEIR's conclusion that the Project will have no significant impact on historic resources is not credible. As discussed above, the historic core is a low-rise district that contains some of the oldest structures in Los Angeles. The Project's design and scale are glaringly incompatible with the

architecture of Union Station, Pico House, the Avila Adobe, the US Post Office and numerous other structures in the area.

Response P590-6 Refer to Response P590-4 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe and The Winery), the *El Grito* mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5.4, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. Of equal importance is the desire to minimize the perceived scale and mass of the stations. Colors and material finishes of each station will be selected to be complimentary to each of their respective sites and surrounding urban fabric.

Comment P590-7 Additionally, the DEIR does not adequately assess the impact caused by construction of the Project, including significant excavation and associated groundborn vibration. There are a number of structures in the area that are over 100 years old, including the Avila Adobe. Excavation on the scale proposed, including groundborn vibration, could weaken or damage older buildings. The DEIR fails to adequately analyze potential impacts to these historic buildings.

Response P590-7 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable cumulative impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. Table 3.13-28 on page 3.13-62 of Section 3.13, Noise, of the Draft EIR, show the location when on-site

construction vibration impacts would occur during each phase of the construction of the proposed Project. As shown in Table 3.13-28 on page 3.13-62 of the Draft EIR, construction vibration velocities will not exceed applicable FTA structural damage criteria with implementation of mitigation at El Grito Mural or Avila Adobe. In addition, Mitigation Measures VIB-A (Vibration Monitoring) and VIB-B (Force-Adjustable Ground Compaction Devices) detailed below are designed to address potential building damage. As concluded in Table 3.13-28 on page 3.13-62 of the Draft EIR, with implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. Further, As demonstrated in Table 3.13-28 on page 3.13-62 of Section 3.13, Noise, of the Draft EIR, the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project. In addition, as detailed on Page 3.13-72 of the Draft EIR, relevant protective measures are also included in Section 3.05, Cultural Resources, with CUL-PDF-A though CUL-PDF-E, which require pre-construction surveys to document existing conditions at The Winery and El Grito Mural, post-construction inspections to document any construction-related damage, and retention of an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the proposed Project.

Comment P590-8 Geology

The DEIR lists the known faults in the Los Angeles area, and acknowledges hazards at the Project site, including ground shaking, liquefaction, lateral spreading, and ground lurching. The geotechnical report in Appendix I to some degree examines potential impacts related to the Raymond Fault, but the analysis is limited and appears to downplay potential risks. While the presence of the fault does not trigger Alquist-Priolo, there still could be substantial risks. The DEIR states:

Response P590-8 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response P590-9 for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A.

Comment P590-9 "Although these constraints are limiting, the most current models (UCERF3) indicate it has approximately 1.2% probability of participating in an earthquake of magnitude greater than 6.7 before 2038. The upper 95% confidence limit on this estimate is approximately 2.2% of an event with a magnitude greater than 6.7 before 2038. The likelihood of experiencing an event of Magnitude > 7.0 is 0.8%, and the likelihood of experiencing an event of Magnitude > 7.5 is less than 0.1% in that time period."

The most obvious question is, Why does the DEIR's analysis only go so far as 2038? Since the earliest date for the Project's completion is likely to be 2026, it's hard to understand why the DEIR only looks 12 years into the future. Presumably the Project would stand for decades. And given the LA area's susceptibility to seismic activity, it

seems necessary to extend the projection. Also, why does the DEIR not give an estimate for earthquakes measuring less than 6.7? An earthquake on the Raymond Fault measuring 6 on the Richter Scale would have the potential to cause significant damage. Because the Project site is subject to liquefaction, a smaller earthquake also would have the potential to cause significant damage. The DEIR's analysis is clearly deficient.

Response P590-9 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Appendix I for a discussion of how the Raymond Fault was considered in the geotechnical analysis, along with other active fault systems in the Los Angeles Region. As discussed on Page 17 in Section 4.2.1.1, Faulting, of Appendix I, Geotechnical Document in Support of the Environmental Impact Report, to the Draft EIR, the analysis of potential seismic geological impacts to the proposed Project was based on data derived from the Uniform California Earthquake Rupture Forecast (UCERF 3). The UCERF 3 provides authoritative estimates of the magnitude, location, and time-averaged frequency of potentially damaging earthquakes in California. The model is not limited to providing probabilities for earthquakes measuring 6.7, and does provide probabilities beyond 2038. The proposed project would be designed based on probabilistic ground motions estimated by UCERF 3 which includes all the known contributing faults in the area of the proposed Project. The UCERF 3 is focused on forecasting earthquakes and does not address liquefaction. UCERF is a tool developed to evaluate seismic forces on buildings. The seismic forces in California are based on a seismic event that repeats every 2,500 years (2,500-year return period) per the latest building code. The UCERF model helps to determine what combination of faults, magnitudes and intensities will create a Maximum Credible Earthquake (MCE) with a 2,500-year return period. The proposed Project will be designed to meet applicable state building codes, which incorporate the MCE event, and all the faults and intensities that contribute to the MCE event. Liquefaction is discussed in Section 3.7.2.5. Regional Seismic Hazards, and in Section 4.2.1.2, Liquefaction, in Appendix I. As discussed therein, the proposed Project would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." As discussed in Section 3.07, the CEQA Guidelines Appendix G thresholds only require the analysis of potential impacts related to "strong seismic ground shaking," and therefore the Draft EIR appropriately considered earthquakes of a certain magnitude with the potential for considerable ground shaking. The Draft

EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment P590-10 Aside from the Raymond Fault, the DEIR fails to consider the Puente Hills Blind-Thrust Fault, which seismic experts believe could represent the greatest threat to the LA area. While the PHBT Fault is five miles from the Project site, scientists have expressed the opinion that a rupture on the PBHT could be felt as far as Downtown and beyond. Though scientists believe the probability of a major rupture on the PBHT is low, they also believe that even a lesser rupture could cause substantial damage. Please see the following study:

Response P590-10 Refer to Response P590-11 for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, which addresses the Puente Hills fault. As discussed in Response P590-9, the proposed Project will be designed in accordance with applicable state building codes, which incorporate the MCE event, the 2,500-year event that takes into consideration all faults with potential to create ground motions affecting the proposed Project site. The Puente Hills fault is one of the faults considered in the MCE event. In addition, the Puente Hills is a blind fault. A blind fault is a thrust fault that does not rupture all the way up to the surface so there is no evidence of it on the ground. Because blind thrust faults are not capable of surface fault rupture, the risk of surface rupture due to faulting is considered low. As discussed on page 3.7-14 of the Draft EIR, "[t]he proposed Project would be constructed in accordance with applicable standards, requirements, and building codes, which would ensure structural integrity and safe construction." This compliance, along with the implementation of Mitigation Measure GEO-A, requiring the development and implementation of a site-specific geotechnical investigation and report that would include geotechnical recommendations for project design and construction, would reduce impacts related to the strong seismic ground shaking, seismic-related ground failure, and/or liquefaction during construction of the proposed Project to less than significant. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) As discussed in Section 3.07, Geology and Soils, of the Draft EIR, construction and

operation of the proposed Project would result in less than significant impacts related to geology and soils upon the implementation of Mitigation Measure GEO-A.

Comment P590-11 New Methodology for Defining Concealed Earthquake Sources, Puente Hills Blind-Thrust USC, Harvard, USGS, James F. Dolan and Shari A. Christofferson, February 2003 https://earthquake.usgs.gov/cfusion/external_grants/reports/02HQGR0042.pdf

Here's an excerpt from page 6:

A large-magnitude PHT event would have devastating societal and economic impact on California. Not only does the PHT lie directly beneath Los Angeles, but this northdipping fault also defines the northeastern edge of the Los Angeles basin, a 10-km-deep, sediment-filled trough. Computer simulations indicate that these thick basinal sediments will significantly amplify both the duration and amplitude of strong ground motions (Olsen and Archuleta, 1996; Wald and Graves, 1998; Field et al., 2000). If a major PHT rupture similar to those we have documented were to exhibit updip directly, a common occurrence in many thrust earthquakes, seismic energy would be focused directly into the thick sedimentary fill of the Los Angeles basin. In addition to strong ground motions associated with Mw≥7 earthquakes on the PHT, the coseismic development of 1- to 2-mhigh, ≤125 m-wide fold scarps, such as those observed at the Carfax site, will greatly disrupt any infrastructure built across the zone of active folding. Recognition of these narrow zones of co-seismic folding indicates that blind thrust faults represent as significant a surface-deformation hazard as faults that breach the surface.

Please see also the following:

Loss Estimates for a Puente Hills Blind-Thrust Earthquake in Los Angeles, California

Seligson, Et Al, May 2005

https://pubs.er.usgs.gov/publication/70029508

Here's an excerpt from the abstract:

Based on OpenSHA and HAZUS-MH, we present loss estimates for an earthquake rupture on the recently identified Puente Hills blind-thrust fault beneath Los Angeles. Given a range of possible magnitudes and ground motion models, and presuming a full fault rupture, we estimate the total economic loss to be between $82 and $252 billion. This range is not only considerably higher than a previous estimate of $69 billion, but also implies the event would be the costliest disaster in U.S. history. The analysis has also provided the following predictions: 3,000-18,000 fatalities, 142,000-735,000 displaced households, 42,000-211,000 in need of short-term public shelter, and 30,000-99,000 tons of debris generated. Finally, we show that the choice of ground motion model can be more influential than the earthquake magnitude, and that reducing this epistemic uncertainty (e.g., via model improvement and/or rejection) could reduce the uncertainty of the loss estimates by up to a factor of two.

We note that a full Puente Hills fault rupture is a rare event (once every ???3,000 years), and that other seismic sources pose significant risk as well. ?? 2005, Earthquake Engineering Research Institute.

Response P590-11 Refer to Section 3.07, Geology and Soils, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A. Refer to Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, which addresses the Puente Hills fault. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." In addition, as discussed in Response P590-9, the proposed Project will be designed in accordance with applicable state building codes, which incorporate the MCE event, the 2,500-year event that takes into consideration all faults with potential to create ground motions affecting the proposed Project site. Refer to Section 3.07, Geology and Soils, of the Draft EIR for discussion of how although the proposed Project would be in the seismically active region of southern California, it would not be in a State of California Earthquake Fault Zone (Alquist-Priolo Earthquake Fault Zone), and would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquification, or landslides.

Comment Letter P591 – Lydia Moreno

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P591

Comment P591-1 Mr. Zelmer, Deputy Executive Officer,

Los Angeles County Metropolitan Transportation Authority,

As a member of the Solano Canyon community, I am AGAINST this proposed gondola our historic neighborhood. I am concerned about our neighborhood's historic infrastructure, our neighbor's privacy, our safety, and public costs associated with this project.

Response P591-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P591-2 Our community didn't ask for this project. The project will require the use of public rights of way, public airspace, and public lands for the placement of multiple towers with suspended cars intended to move a few thousand people in each direction between Union Station and Dodger Stadium for games and events.

Response P591-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the

environmental review process. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P591-3 We know this is not about Dodger fans, this is Frank McCourt making money. Why is the city and the agencies silent in the fact that a millionaire kept land taken with the power of eminent domain? While other cities are doing the right thing, the city of LA is silent in the land stolen from people in the ravines, and then sold to a private corporation, further divided and kept by Frank McCourt.

Response P591-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P591-4 LA should focus on fixing public transportation to and from the stadium. The city of Los Angeles should stop handing out sweetheart deals to millionaires.

Response P591-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would

reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P591-5 Metro has a line in Chinatown already, why not connect it to the stadium? This, in and of itself, is an idication that Metro is looking the other way for Frank McCourt. Building a project of this magnitude when the Dodgers only have 81 home games a year and limited events is a waste of taxpayer dollars. What else is McCourt and Metro not telling us?

Response P591-5 Refer to Response P591-4 for a discussion of the need for the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of the proposed Project system's ability to overcome grade and elevation issues between LAUS and Dodger Stadium while providing safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first / last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by

revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P591-6 Do this community right for the first time. You took our land, to put a stadium, them a freeway, then a toxic dump, more freeways. Keep this gondola away from our community.

Response P591-6 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P592 – Elvin Vu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P592

Comment P592-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P592-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P592-2 I'm a huge baseball fan and a frequent metro rider. I think the gondola is a gimmick that is unnecessary.

Response P592-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P592-3 regarding the need for the proposed Project.

Comment P592-3 You already have the busses from union statiom. There are Bars and other services at union, why do you need a gondola at la state park? Doesn't make sense. Keep la state park separate from baseball fans

Response P592-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer

to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P592-4 I think the busses are great and there isn't a need for another useless "angels flight"

Response P592-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P592-5 If anything, why not make the walk to dodgers stadium better? Clean up the bridge across the free way and or create more lights and stairs to climb the hill.

Response P592-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger

Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium and the proposed Project would include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station.

Comment P592-6 Go busses and walking to the game. No on the gondola.

Response P592-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Responses P592-3 through P592-5 for discussion of the purpose and need for the proposed Project, the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express, and the Pedestrian Enhancement Alternative.

Comment Letter P593 – Angela Davis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P593

Comment P593-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This is not environmentally valid.

Response P593-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR.

Comment Letter P594 – Anna Gruben

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P594

Comment P594-1 I?m writing in strong opposition to the proposed gondola project.

Response P594-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P594-2 My 7-year-old attends an outdoor school that frequently meets at LA State Historic Park. This is after months of struggling at a more traditional school. He is thrilled to be there. A gondola would seriously threaten the safety, beauty and quality-of-life of this space. Gondola cars flying 26 feet over the park is one of the many concerns that are not addressed adequately by DEIR.

Response P594-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P594-3 This project needs to be stopped.

Response P594-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P595 – Valerie Veator

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P595

Comment P595-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P595-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P595-2 LA needs to stop kicking the cab down the road - we need meaningful improvements made to our traffic patterns and infrastructure instead of this gimmick of a "solution" - a gondola does NOT serve this community in the least.

Response P595-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P596 – Michael Steinborn

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P596

Comment P596-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P596-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P596-2 We need more investment in actual public transit, not sports-driven development.

Response P596-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P596-3 Like the Olympic bid, this project has been rammed through with no public input because the public, when learning all the facts, would reject it. STOP THE GONDOLA!

Response P596-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Response P596-2 for discussion of the need for the proposed Project.

Comment Letter P597 – Lydia M Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P597

Comment P597-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This is not environmentally valid.

Response P597-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR.

Comment Letter P598 – Jacqueline Calvache

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P598

Comment P598-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I was born and raised in the Eastside of Los Angeles and I've worked in the community all of my adult life.

Response P598-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P598-2 I will be impacted everyday if this project moves into motion, my daily commute will be impacted as I drive through Chinatown and Union Station daily.

Response P598-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel.

Comment P598-3 I see firsthand the needs of these communities and I am sick and tired of seeing community neglected and cast off for monetary gain. This gondola is not for the

people of LA. This does not reflect the needs of this community, stop displacing people and do not proceed with this project. Listen to the needs of community and do better.

Response P598-3 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing.

Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Commitment to Community Benefits, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station),

as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P598-4 We do not want this project, we do not need this.

Response P598-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P598-3 for discussion of the need for the proposed Project and the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P598-5 We need cleaner air and affordable housing. This project will do the opposite of that, it will continue the rapid gentrification of our neighborhoods and the pollution of an already over polluted community. Do better by your people and this community. We do not bleed blue. We bleed red. Stop the violence and stop the gondola.

Response P598-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities, Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Response P598-3 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, and the proposed Project's outreach efforts to communities along the proposed Project alignment during each stage of the environmental review process.

Comment Letter P599 – Isabel Frampton Wade

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P599

Comment P599-1 I am writing to submit public comment on the matter of LAART. I would like to voice my strong opposition to this project.

Response P599-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P599-2 As a resident of Echo Park and a garden manager at the Solano Canyon Community Garden, I know how disastrous this project would be to our community's quality of life. Time and again the communities of Chavez Ravine, Solano Canyon, and Echo Park have been sacrificed for the benefit of Dodger stadium, and it is time that the city put a stop to this destructive land grab.

Response P599-2 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P599-3 There are several reasons I am concerned about this project. A major one concerns traffic. The surrounding neighborhoods to the proposed Gondola project already suffer from congested traffic and gridlocked cars on every home day game. As I have witnessed on numerous occasions, visitors to Dodger Stadium unfortunately lack basic respect for the communities they are traveling through and parking in. This includes littering, being loud, making dangerous traffic maneuvers. The Gondola project will exacerbate, not ameliorate, this problem!

Response P599-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the

intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P599-4 It will also directly negatively impact the LA State Historic Park, a cultural gem for everyone who visits it. The project plans to cut down many mature trees in the park, which is a horrible idea for a city that suffers from terrible lack of shade resources impacting its poorest communities.

Response P599-4 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary

system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Additionally, the proposed Project would include new shade resources in the park including the Chinatown/State Parks Station at the entrance of the park.

Comment P599-5 Finally, giving this project a green light would lead to further speculative land grabs in the surrounding areas, which have already suffered at the hands of developers driving rent prices up.

Response P599-5 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P599-6 At a time when Angelenos are fed up with the lack of public transportation in our city, it is an utter embarrassment and profound negligence to think the city would approve a project for a "public transportation" option that would only benefit visitors to a baseball game. Please consider how detrimental this project would be to all the city, and say no to developers!

Response P599-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P600 – David Michel

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P600

Comment P600-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). Community residents deserve to have an input in large projects like this. This project would worsen issues like pollution in communities that have historically been ignored by LA Metro. These injustices cannot continue.

Response P600-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a

permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

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FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

December 2023

State Clearinghouse No. 2020100007

VOLUME IV

Prepared for:

Los Angeles County Metropolitan Transportation Authority

Metro

Prepared by:

Kimley-Horn

Kimley»Horn

Expect More. Experience Better.

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Comment Letter P601 – Lauren Woodrow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P601

Comment P601-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I''m a resident of the Dodger stadium neighborhood and know the current traffic patterns well. It isn''t great, but this proposal only seems to benefit Gondola investors hoping to make a profit from the Gondola itself or future related developments. Any claims of alleviating traffic or helping the surrounding communities are a sham.

Response P601-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other

development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment P601-2 The idea that funneling traffic into Chinatown to solve current traffic jams isn''t sound. It is simply relocating the traffic to an already congested area. The streets around Union station are already jammed, especially during commuting hours. Dodger games and concerts coincide with the evening commute for so much of the year that this traffic seems likely to be worse than current conditions.

Response P601-2 Refer to Response P601-1 for discussion of how the proposed Project would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P601-3 The development of a Gondola will burden Chinatown, a community already struggling with gentrification, with additional rent hikes and elderly displacement. Not to mention the prospect of new commercial and luxury residential developments that are likely to follow the Gondola, further pushing out current residents.

Response P601-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. The proposed Project would provide an additional transit option for surrounding residents in Chinatown, and as discussed in Section 3.14, Population

and Housing, of the Draft EIR, is not anticipated to substantially generate new development.

Comment Letter P602 – Naoko Ward

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P602

Comment P602-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P602-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P602-2 The gondola will only lead to further gentrification of Chinatown, harming the elders who have lived there for years. The community does not want this.

Response P602-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, directly led the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P603 – Alexandra Abdel-Malek

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P603

Comment P603-1 Deputy Executive Officer Cory Zelmer,

Good afternoon, I'm writing to ask that you vote against the Los Angeles Aerial Rapid Transit Project ("The Gondola") at Dodger Stadium

Response P603-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P603-2 This project would displace traffic from Dodger Stadium by placing the burden and environmental on residents of Chinatown. This would disrupt the community and is a huge waste of time and resources for something that doesn't truly count as public transit. In reality we need serious investment in public transit across Los Angeles County in order to ease our massive traffic problem.

Response P603-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit

connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P603-3 This project will also cause a spike in housing costs, displacement, and gentrification in Chinatown, whose residents need more housing security, not less.

Response P603-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P604 – Paul Guijarro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P604

Comment P604-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P604-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P604-2 The proposed gondola's station in front of one of our most historic and beautiful buildings, Union Station, will be completely blocked from all viewing angles from the Pueblo and from Alameda St. This is unacceptable. No structure should block views of Union Station or the Historic Pueblo.

Response P604-2 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, Los Angeles Union Station (LAUS) was designed in response to its proximity to El Pueblo de Los Angeles. As such, one aspect of LAUS' setting that is important is its axial connection and visual relationship with the Los Angeles Plaza Historic District. The proposed Alameda Station would be located over 100 feet north of the main axis—at the intersection of Los Angeles Street and Alameda Street—between LAUS and the Los Angeles Plaza Historic District. The location is sufficiently offset so it would not interrupt the physical and visual relationship between the two historical resources. This important aspect of the LAUS' setting would be maintained.

Comment P604-3 Don't fuck up the area around the Historic Pueblo, Union Station and the LA Historic State Park with a gondola that would just be visual and actual blight. Build a subway from union Station to Dodger stadium instead, just like New York City has a dedicated short subway line between Times Square and Grand Central Station.

Response P604-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium

draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P604-4 Do not allow the gondola to be built.

Response P604-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P605 – Nina Kagan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P605

Comment P605-1 I am writing today to voice my strong opposition to the LAART project as a representative of the Crenshaw/Slauson community. I, Nina Kagan, will be impacted by this project for a wide array of reasons.

Response P605-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P605-2 through P605-9.

Comment P605-2 My primary concern of this project is it's exceptional cost and few benefits for the vast majority of metro riders. As someone who frequently uses the expo, red and purple lines, I feel like it is ridiculous to focus energy on a project that serves exclusively dodgers stadium, because it does so little to incentivize average commuters to use public transportation. If anything, the project looks to push traffic for Dodger's Stadium outside of the area into surrounding areas, while providing no feasible utility for most people, who want to get from home to work with ease.

Response P605-2 The proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at Los Angeles Union Station (LAUS). The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce

vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P605-3 I've taken metro for the past decade, and although bus systems have gotten marginally better over time, the infrequencies of service on important routes (Vermont for example) make connecting between the city difficult and inconvenient. The goal of our cities infrastructure should be to get people where they need to be safely, affordably, and environmentally soundly.

Response P605-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no

additional cost under the Community Access Plan. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with RTP/SCS, this as the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities, and would otherwise reduce greenhouse gas emissions by reducing VMT. Also refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would also include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P605-4 The proposed project will be visually distracting in the overall skyline,

Response P605-4 Refer to Section 3.01, Aesthetics, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including to scenic vistas. As analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted and the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P605-5 and will bring more tailpipe emissions into communities, with new drivers (WHICH PUBLIC TRANSPORTATION SHOULD BE ELIMINATING).

Response P605-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through

reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model and how the proposed Project would reduce vehicle miles traveled. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Comment P605-6 This project does little to support the mobility of the public, and quite honestly it's an offensive reminder of the failure of the city to build the affordable housing project Elysian Park Heights on the land that the Dodger's stadium now sits on.

Response P605-6 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would also provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P605-7 Why should I as a taxpayer be forced to foot the bill for something so overtly offensive to me? I've put up with getting screamed at, harassed and watched people openly smoke crack on the Red Line, and yet I continued to take transit, because I found something positive in the lack of emissions public transit options offer in comparison to driving.

Response P605-7 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation.

Comment P605-8 Metro should be transparent in their policies. If you don't care about poor people that's horrible but not surprising. What is offensive is asking us to foot the bill so you can show rich people what your city has to offer to rich clients by the time the 2028 Olympic bid rolls around. It's ridiculous, it's shady and it's downright evil.

Response P605-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P605-9 No metro projects should go forward without community input PERIOD.

Please cancel this project,

Response P605-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P606 – Rachel Sumekh

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P606

Comment P606-1 Hi,

I am a part of the LA28 Olympics Creator group. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This wont reduce traffic or green house emissions. We need so many projects in LA, this isn't one.

Response P606-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment Letter P607 – Victoria Steele

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P607

Comment P607-1 Thank you for the opportunity to comment on a project that will affect those of us who live in Chinatown. Attached is a PDF version for your convenience. I am a resident of Metro@Chinatown Senior Lofts and have been a Metro rider for decades. My main concerns are as follows:

Response P607-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P607-2 through P607-20.

Comment P607-2 Privacy

The gondola will be going over or near residential areas, allowing a view of outdoor community areas in apartment complexes and the backyard of homes, hopefully not through windows or skylights. Those who like to take photographs or shoot video will do so. These photographs and videos could then be posted on social media.

Fogging the windows will frustrate whose who want to take photographs and expect to be able to do so. Not fogging the windows will eliminate privacy for residents. This transit system should never be build over or near current residential areas.

Trust is a big issue these days. People with authority say something one day, only to be proven to be liars months later. You say that you will fog the windows when near apartment buildings and houses. But will you do so if tourists with cameras are willing to pay $30 for a ride? Once you have your system built, will you keep your promises?

Response P607-2 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and as discussed in Topical Response M, Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while

adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P607-3 Aesthetics

The modern station design is not appropriate when in the vicinity of historic buildings such as Union Station and those at El Pueblo. The birthplace of our city deserves more respect than this.

Response P607-3 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to Los Angeles Union Station and El Pueblo, which would be less than significant. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project's Alameda Station is in an urban area that currently has a mix of architectural styles, building materials and colors, as well as a mix of primarily traditional and some modern style buildings. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. The Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment P607-4 The drawings of the Chinatown Station were not adequate to give a good sense of what the area will look like. The Gold/L Line Station has a Chinese theme which is appropriate for the area. It looks like the gondola is encroaching too much into the park. The park is a celebration of nature and of history. The gondola is neither.

Response P607-4 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to the Los Angeles State Historic Park, which would be less than significant. KOPs critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional simulations of the Park. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. Landscape Unit (LU) 3, where the Chinatown/State Park Station would be located, currently has a mix of architectural styles and building materials and colors, including traditional Chinese architecture within the adjacent Chinatown community. The Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and the design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by LA ART riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park. Further, the pedestrian access enhancements in LU-3 between Metro's L Line (Gold) Chinatown Station and the Chinatown/State Park Station would acknowledge the visual character of existing park amenities. For example, the hardscape and landscape improvements, shade structures, and potential seating would incorporate design features that would establish a unifying and cohesive design consistent with the overall character of the existing structures within LU-3.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Chinatown/State Park Station. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the

total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response F, Los Angeles State Historic Park, and Responses to S2 for discussion of how, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The design for the proposed Project's stations and junction studied in the Draft EIR would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming.

Comment P607-5 The design of the gondola may look fine in a more modern community but it does not in the older, historic parts of downtown.

Response P607-5 Refer to Responses P607-3 and P607-4 for discussion of how the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition.

Comment P607-6 Other considerations

The lighting should not shine into any home or apartment.

Response P607-6 As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Project area is a developed, urban area with a high amount of existing ambient lighting. The high levels of ambient lighting exist due to vehicular and pedestrian street lighting, building security lighting, outdoor landscaping lighting, and lighting along and adjacent to the various dedicated transit guideways traveling to Union Station, such as the elevated Metro L Line (Gold). In addition, high levels of ambient lighting are exhibited from vehicle and truck headlights traveling on streets and the SR-110. Cathedral High School currently has high-poled sports field lighting visible from North Broadway, Los Angeles State Historic Park, and area residents when in use. Dodger Stadium has

extensive television quality sport field lighting in use during games and special events. Large special events which occasionally occur at the Los Angeles State Historic Park can also generate high levels of lighting. Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, and towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and mobility hubs would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction. As such, operations of the proposed Project would result in a less than significant impact on light and glare. In addition, Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting.

Comment P607-7 The Need

Is there truly a need for this project? How many people are standing in line to wait for the next express bus? Are the buses too crowded and do many people have to stand? Do some people give up and leave? Are some late in getting to the game?

Response P607-7 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how travel times for the Dodger Stadium Express are three to seven times the seven-minute travel time on the proposed Project. The Draft EIR concluded that the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would render the proposed

Project substantially more competitive with driving time than the current Dodger Stadium Express (see Draft EIR page 4-63, page 4-71). After a game, travel times on the Dodger Stadium Express from Dodger Stadium to LAUS ranged from approximately 18 minutes to 49 minutes, compared with the estimated seven-minute travel time on the proposed Project. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with existing conditions. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. The queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. This is in contrast to the Dodger Stadium Express, which would have more static queues that would build over time as departure frequency would be substantially less frequent than the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P607-8 These are the people that you will be serving. They would just be changing from one form of public transit to another. Many others will try the gondola. It is a novelty. But will they continue riding it indefinitely?

Response P607-8 Refer to Response P607-7 for an overview of the need for the proposed Project. Refer to Table 3.17-4 on page 3.17-35 of Section 3.17, Transportation, of the Draft EIR for the ridership forecasts. The proposed Project is expected to generate from 3,830 to 13,030 regular riders per day, depending on the year and whether there is a game or event at Dodger Stadium. Additional information and assumptions regarding the ridership forecasting that feeds into the VMT analysis can be found in Appendix N of the Draft EIR.[1] Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N,

[1] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Transportation Appendices of the Draft EIR. Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P607-9 This project is not about how many people the gondola can carry each hour, but how many people want to use it on a regular basis. Since it will be disruptive to Chinatown due to increased traffic on narrow streets, decreased available parking, and a probable loss of privacy, the need had better be proven.

Response P607-9 Refer to Response P607-8 for discussion of the ridership forecasts of the proposed Project, which were based on detailed analysis from Fehr & Peers which prepared Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, including the ridership model, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts to transportation. The Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be

located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P607-10 I am tempted to think that your modeling of future ridership is too optimistic. Your literature says that the project will remove 3000 cars from the road, but the UCLA study puts the number closer to 600.

Response P607-10 Refer to Response P607-8 for discussion of the ridership for the proposed Project. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Comment P607-11 With the large amount of parking available at the stadium and the desire of many drivers to drive there, the first priority should be to improve access to the parking lots and supply shuttle buses going up the hill before the games if practical.

Response P607-11 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P607-12 Second, there should be a dedicated bus lanes both before and after the game. Since the gondola does not come to a full stop, some people may prefer the bus even if the gondola is built – handicapped, elderly, a parent with several small children, etc.

Response P607-12 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Response P607-11 for discussion of the Transportation Systems Management Alternative to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Comment P607-13 There is also the possibility of direct bus service connecting to more remote locations or from other directions. Is there any need for bus service to Elysian Park hours before the game?

Response P607-13 Refer to Response P607-11 for discussion of the Transportation Systems Management Alternative to the proposed Project. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could

utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment P607-14 A Further Note The Los Angeles State Historic Park does not need the gondola. It has the Gold/L Line. It does need a bridge across the tracks at the northern portion of the park. This is a need. It is not directly related to the gondola and would be at the bottom of the list of priorities for its construction.

Response P607-14 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the State Park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment P607-15 Additional Comments

Metro should never divert money from the public transit system to the gondola since the route is short and few riders would benefit. At this time, it did not sound like a possibility but things can change.

Response P607-15 Refer to Response P607-7 for discussion of the purpose and need for the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed

Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P607-16 I assume that none of the structures build for the gondola system will disrupt the view of the stadium fireworks for any of the surrounding communities. Is this true?

Response P607-16 To the extent communities near the Dodger Stadium property have a view of the Dodger Stadium fireworks, it is not anticipated the proposed Project would disrupt the view.

Comment P607-17 Please pay attention to what small business owners and managers are saying. I do not know how the increased traffic and competition for parking places will affect them and their regular customers. These businesses are important to the community.

Response P607-17 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized

increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P607-18 I live in a senior building in Chinatown. The increased traffic should make it more difficult to find parking places. Seniors usually do not want to walk far or may not feel safe at night.

Response P607-18 Refer to Response P607-17 for discussion of traffic congestion and parking. Specifically as it relates to parking, as recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment P607-19 There are many important issues examined in the report, such as geology and soil. I have some concern but am not knowledgeable enough to make comments. I will have to leave that to others.

Response P607-19 Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A.

Comment P607-20 There appears to be many good people who worked hard on this proposal, having listened to many of the concerns, and others who have studied it and prepared the report. I respect that. But I have seen too much corruption to fully trust in what I am told. Is this really needed? Thank you for all the effort that is going into the study of this proposed project. May you reach a wise decision.

Response P607-20 Refer to Response P607-7 and Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment Letter P608 – Yee Ting Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P608

Comment P608-1 Hi there,

I live in Echo Park near Dodgers Stadium and do not want this project in our neighborhood. I really don't like the traffic during Dodgers games either, but a gondola is not the way to solve it. A gondola is a transit method to get a large amount of people somewhere over a long period of time. It sounds like you need a transit method that will get a large amount of people somewhere in a quick amount of time to fill the stadium. It doesn't make sense to me how this will achieve any benefit for us.

Response P608-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations for a discussion of the proposed Project's passenger capacity and operations, including capacity to carry up to approximately 5,000 passengers per hour per direction (pphpd).

Comment P608-2 Solano Canyon, Elysian Park, and the State Park are also beautiful greenspaces that do not need gondola cabins cutting through to ruin that. It is already so hard to access greenspaces in LA, why tamper with the little we have already to give ourselves peace and tranquility?

Response P608-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 2.0, Project Description, of the Draft EIR. The proposed Project alignment does not cut through Solano Canyon or Elysian Park. Refer to Section 3.01, Aesthetics and Appendix C, Visual Impact Assessment and Lighting Study, for analysis of how the proposed Project will have less than significant aesthetic impacts to Solano Canyon, Elysian Park, and the Los Angeles State Park.

Comment P608-3 I also understand the construction will *destroy* trees and local bat populations in and around the State Park. This is wrong.

Response P608-3 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located.

Comment P608-4 We are in a climate crisis and to destroy the environment for such an ill-informed idea is awful. Please just invest in proper transit. Expand the shuttle system to the gondola. Inform Dodgers game-goers to get there earlier. Anything but this.

Response P608-4 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.16, Public Services, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems,

3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P608-5 I also understand you are not building any additional parking for this project. That means to board, people have to go to Union or College Station. So you're banking on existing transit-goers to use the gondola. Who would even do that? This is Los Angeles. Everyone knows the majority of us drive everywhere, and drive on gamedays. Do people really think they will stop driving to games just to take the gondola? That doesn't sound like any Angeleno I know. And I have lived here for 28 years.

Response P608-5 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[2] Stantec is an internationally respected global design

[2] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. The average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845[3]), so the majority of riders are expected to shift from other modes.

The existing Dodger Stadium Express bus service has grown its ridership 250% since it started operating in 2010 through the 2019 season,[4] indicating quantified and increased demand for transit service between LAUS and Dodger Stadium. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. In addition, as detailed on page 28 of the Appendix N, PDF, in the table titled LA ART MODE OF ACCESS DATA CONSIDERED AND ESTIMATED FUTURE MODE OF ACCESS, 8.6% to 26% of Dodger Stadium Express riders take a vehicle (park and ride or TNC) to access the Dodger Stadium Express. For a conservative analysis of parking demand, 27.6% of proposed Project riders are estimated to park and ride.

Comment P608-6 Another thing is, there is traffic coming from all sorts of directions throughout LA to get to Dodgers Stadium. I don't see this project proposed from Silver Lake or Angeleno Heights. Instead, it will be built on top of Chinatown where the population is largely elderly immigrants. This isn't right at all, and shows how misguided this project is.

Response P608-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed

[3] Los Angeles Dodgers. 2019. Dodger Stadium Express Rider Counts.

[4] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2021. Metro Final Report: MSRC Contract MS21001 Dodger Stadium Express 2019 Season. Available at http://www.cleantransportationfunding.org/sites/default/files/projects-final-reports-2020-04/MS21001_Metro_Dodgers_Final_Report.pdf. Accessed August 2023

Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. The public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. The proposed Project is also designed to be ADA compliant.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P608-7 Please, I too want the traffic to go down. Gamedays really mess with my local traffic as I'm just up the hill from Stadium Way, but this aerial gondola doesn't seem like it will address that at all. It's such an absurd idea.

Response P608-7 Refer to Response P608-5 for a discussion of the average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042). Refer to Response P608-6 for an overview of the need for the proposed Project. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P608-8 I've seen the advertisements too. People seem to think it will be exciting to ride and that it will have low emissions. I too want to reduce my emissions when I'm stuck in

traffic, but if you don't build additional parking, aren't you just moving the emissions from our area to the Downtown and Chinatown areas? Making these already run down areas worse? I know I am lucky to live where I live so close to Elysian trails, but not everyone else is. And certainly people in more difficult living situations should not have that be made worse for them. Effectively, this project is a health hazard.

Response P608-8 Refer to Response P608-6 for discussion of the proposed Project's ability to reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P608-9 Oh, and aren't there only 80 home games in a year? So 285 days of the year, 78% of the year you want the gondola to run for no reason? Can you explain how Los Angeles

Metro, who we should trust to meet the people's needs for transit, to get to work, to get home— how did your experts decide this was a good idea? How do you justify this?

Response P608-9 Refer to Section 2.0, Project Description, of the Draft EIR, discussing how, in addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership. Refer to Response P608-6 for an overview of the need for the proposed Project.

Comment P608-10 Frankly, this injures my faith in our Metro system. I just don't understand how the project got this far.

Response P608-10 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P608-11 Please, save the trees, save the bats, and leave our elders alone. Please think of something else.

Response P608-11 Refer to Response P608-3 for discussion of how the proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located, and how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. Refer to Response P608-7 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, and how the Draft EIR addresses environmental justice.

Comment P608-12 I do not want this LA ART Gondola. I want better for all of this.

Response P608-12 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment

does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P609 – Brian Smee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P609

Comment P609-1 Hi,

I'm a resident in Solano Canyon and want to voice that I do not support the construction of the proposed Gondola in any way.

Response P609-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P609-2 Build a bridge from Broadway to the park instead for crying out loud. Surely there's a better way to spent $300 million than a vanity project gondola.

Response P609-2 Refer to Section 6.0, Design and Use Options, of the Draft EIR for discussion of Design and Use Option E, Pedestrian Bridge at the Los Angeles State Historic Park. While the pedestrian bridge from North Broadway to the central portion of the Los Angeles State Historic Park is not proposed as part of the proposed Project, the Draft EIR includes analysis of the pedestrian bridge for the Los Angeles State Historic Park thus providing environmental clearance for the bridge. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the

surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P610 – Nadia Taha

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P610

Comment P610-1 Dear Mr. Zelmer,

I live at the top of the hill where Chinatown meets Echo Park, right up against Dodger Stadium. My neighborhood is most impacted by the traffic on game days and during events, and will be most impacted by the proposed LA ART.

Response P610-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P610-2 I am ardently opposed to it, for a myriad of reasons. Chief among them is that this project is exorbitantly costly, and those funds would be better spent improving our existing infrastructure, including bus/bike lanes. Developing an entirely new transportation system from scratch is an unreasonably expensive proposition when compared to making improvements to the existing transit modes. That the project proposes to make up some of that expense by charging passengers -- when the shuttle busses from Union Station are free -- underscores how unwarranted and reckless this added cost is.

Response P610-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features,

for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P610-3 What's more, this project as proposed is a ruthless intrusion into residents' lives. Between the lack of transparency around the ownership, bidding process and eventual operation of the project and the potential for advertising, lighting and other visual assaults to become overhead fixtures in our neighborhood, the entire prospect is unwelcome.

Response P610-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response K, Signage and Lighting for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. The proposed Project lighting would include low-level lighting for security and wayfinding purposes. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses.

Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P610-4 Please heed the local community opposition and invest in improving our existing transit options instead!

Response P610-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P610-7 for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P611 – Alan Pena

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P611

Comment P611-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I do not think this is a safe project to build.

Response P611-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Response P611-2 for discussion of the proposed Project's safety features.

Comment P611-2 What if it falls on top of the people below? I do not see safety plans in place that will prevent this. And what happens if it stops and people get stuck inside? How will you escape? How long will it take for help to get there in time? And what if you are stuck inside and you need to use the bathroom?

Response P611-2 Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. The plan would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. The plan would also address the unlikely scenario where the system cannot be moved to unload passengers normally at stations. As noted above, the robust design, periodic and preventative maintenance, and equipment redundancies are intended to minimize this scenario. However, the plan would include procedures to evacuate passengers directly from cabins, if needed.

Comment P611-3 The Gondola will mess with the birds flying through the area too and we need our natural animals and birds populations.

Response P611-3 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how the proposed Project would not result in significant impacts to bird populations or to special status species. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the

proposed Project is less than significant. Design features of the proposed Project are likely to reduce the risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines.

Comment P611-4 I think you should build more buses and trains and subways instead. You are Metro, not LAX.

Response P611-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways.

Comment Letter P612 – Gabriela Davidson-Gomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P612

Comment P612-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P612-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P612-2 I am an Environmental Studies student at Loyola Marymount University and I am concerned about this project's likelihood to break up historic neighborhoods like Chinatown and displace residents, which would contribute further to gentrification in which Angelenos can no longer afford rent in the neighborhoods where they have roots. I am against this project because transit options should be implemented to benefit the communities they are placed in, rather than pushing longtime residents out in order to bring in outsiders for sports events.

Response P612-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles

to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P612-3 The community was never consulted about this project and it is irresponsible to move forward without the community getting to lead the process, because this project prioritizes making money from visitors and is not at all based on what local communities (where the impacts will be greatest) need or want.

Response P612-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to

all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. As summarized in the Executive Summary to the Draft EIR, operational impacts from the proposed Project would be less than significant.

Comment P612-4 Furthermore, a UCLA study found that the gondola will not reduce environmental impacts *nor* traffic in the area. In fact, it will displace greater vehicle emissions into areas served by the gondola, which are already unjustly burdened with pollution.

Response P612-4 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its

useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Comment P612-5 There are other ways to develop effective public transit and I strongly oppose moving forward with this project that will not have foreseeable traffic, environmental, or social benefits, and may actively harm communities in the affected area, whom were not consulted in the process.

Response P612-5 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P612-6 It would be more prudent to spend this money on transit projects planned in coordination with community members, which would best serve Angelenos. Thank

you for your time reading and I sincerely hope you will incorporate the concerns of local community members into this and future projects.

Response P612-6 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, Section 4.0, Costs and Financing, of the Final EIR which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P613 – Ned Teitelbaum

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P613

Comment P613-1 *The plan for the Gondola won't reduce congestion or pollution because it will increase, not reduce, the number of cars coming into the area. It will attract huge numbers of people wanting to ride the Gondola to the stadium, most of whom won't be taking transit, and turning Chinatown into a parking lot for Dodger Stadium.*

Response P613-1 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P613-2 *In addition, **the Gondola will detract from the enjoyment of the Los Angeles State Historic Park, which was fought for by the communities in the area, and would cause those who use the Park to feel boxed in and surveilled from above.*

Response P613-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views.

Comment Letter P614 – Xavier Flores

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P614

Comment P614-1 With the estimated construction period of two years, if construction starts in 2025, the LA ART System could start working in time for the 2028 Los Angeles Olympics.

Response P614-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P615 – Bella Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P615

Comment P615-1 The LA ART Proposal offers the capacity to move approximately 5000 people per hour each way using a technology that is quiet, safe and environmentally friendly, proven to have zero emissions.

Response P615-1 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P616 – Vicky Barahona

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P616

Comment P616-1 It will be easier to carry everybody, reduce traffic, very interesting.

Response P616-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P616-2 it will prevent people from parking in this area and it will attract tourists, very good experience.

Response P616-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P617 – Guadalupe Vasquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P617

Comment P617-1 This is a perfect project, it is about fewer cars, less pollution and safer and healthier neighborhoods. I support the Dodger Stadium Gondola

Response P617-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P618 – Aracely Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P618

Comment P618-1 The ART is a proposal for aerial transit gondolas that could link the Los Angeles Union Station with the Dodger Stadium. The commute is one mile long. It takes approximately 7 minutes.

Response P618-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P619 – Arturo Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P619

Comment P619-1 Very good project. It will benefit us, much less traffic.

Response P619-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P620 – Carlos Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P620

Comment P620-1 I support it because it is free for us who live in the area, and not only that, but it will also take less time than the bus. The bus takes between 35 to 45 minutes and the cable car or gondola just takes 7 minutes.

Response P620-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P620-2 Please approve it.

Response P620-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P621 – Vilma Medre

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P621

Comment P621-1 I like it and support it because it does not pollute, and since it will reduce traffic, I will be able to get home faster after work.

Response P621-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P622 – Saul Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P622

Comment P622-1 I like the project because there won't be so much traffic anymore during game days, it will be easier to move around and very quick, just 7 minutes to get to the stadium.

Response P622-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P623 – Norma Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P623

Comment P623-1 Because it will reduce traffic, that is always the problem here in [illegible] Blvd.

Response P623-1 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P623-2 I have been living here for 22 years and every time there is a game, we have the same problem, a lot of traffic.

Response P623-2 Refer to Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P623-1 for a discussion of how given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment Letter P624 – Jesus Ruiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P624

Comment P624-1 I support it, but I have a question, why has it taken so long? Ten years ago already I had heard of this project but it hasn't been built yet, we would have spent a lot of time without so much pollution.

Response P624-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project is currently undergoing environmental review under the California Environmental Quality Act. Refer to Section 2.10, Required Permits and Approvals, of the Draft EIR for discussion of how the proposed Project requires discretionary entitlements, reviews, and approvals from the California Department of Transportation, California State Parks, California Division of Occupational Safety and Health, Metro, and the City of Los Angeles.

Comment Letter P625 – Katherine Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P625

Comment P625-1 Make this project happen so I can attend more Dodger games. Coming from the City of West Covina it is a long drive. I can park and use gondola for my convenience.

Response P625-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P626 – Adrian Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P626

Comment P626-1 Big Dodger fan so it will be nice to not drive in traffic and be able to get driven to the games. I am all for the gondola so that will be awesome idea. Im all for it!

Response P626-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P627 – Luis Olalde

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P627

Comment P627-1 Have many family members including me to be Dodger fans. It will be nice to sit back and not drive to the games. We can take the gondola back and forth to every game we go to.

Response P627-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P628 – Mary Mares

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P628

Comment P628-1 I have been a Dodger fan for many years and I think this will be a great idea for many people. Knowing how much traffic there is going to the games.

Response P628-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P629 – Yvonne Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P629

Comment P629-1 Convenient and a great idea, I have been a dodger fan since I was young.

Response P629-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P630 – Danielle Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P630

Comment P630-1 When people are handicap it will great use for them and very convient. The senior people need to be considered.

Response P630-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P631 – Elizabeth Urrutia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P631

Comment P631-1 Considering I'm over the age of 75 it will be ideal for this and bring more people to the stadium.

Response P631-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P632 – Celeste Savor

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P632

Comment P632-1 I a support Gondala for several reasons it make for parking problems and improve traffic going to the stadium.

Response P632-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P633 – Norma Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P633

Comment P633-1 I support the gondola because it will help reduce traffic in the area and make it a lot easier for people to get to the Dodger games

Response P633-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P634 – Tina Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P634

Comment P634-1 It will benefit low-income people who take public transportation to Dodger Stadium and other places around that are historic monuments.

Response P634-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P635 – Geraldine Foye

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P635

Comment P635-1 I am definety for the Gondola as it will be easier to attend a game at Dodger Stadium.

Response P635-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P636 – Elida De Anda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P636

Comment P636-1 I love to go to Dodger games And it will be good not to Drive

Response P636-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P637 – Emma Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P637

Comment P637-1 I no longer drive + it will be nice to g on gondola to China town

Response P637-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P638 – Brian Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P638

Comment P638-1 When I go to Olvera St. I can take the gondola to Dodger Staduim

Response P638-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P639 – Jennie Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P639

Comment P639-1 I cant wait to ride the gondola

Response P639-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P640 – Victor Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P640

Comment P640-1 I have bad eye sight + no longer drive Im sure I will ride the gondola

Response P640-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P641 – Linda Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P641

Comment P641-1 I really don't like to drive Downtown so riding the gondola will be nice

Response P641-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P642 – Rogelio Salazar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P642

Comment P642-1 Going to Dodger Stadium + not having to pay for Parking will be nice taking the gondola

Response P642-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P643 – Debra Sosa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P643

Comment P643-1 I support the Gondola because it's easier to get to Dodger Stadium I've been going to Dodger Stadium for years since I was a Kid

Response P643-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P644 – Lucy Quevedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P644

Comment P644-1 I support the Gondola since it would be easier to get to the Dodger game. I've been going to the Dodger games since I was a little girl

Response P644-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P645 – Mary Urrutia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P645

Comment P645-1 I support the Gondola, it's easy access to Dodger Stadium. I've been going to Dodger games since I was a little girl.

Response P645-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P646 – Roxana Duran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P646

Comment P646-1 I support Gondola

Response P646-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P647 – Luis Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P647

Comment P647-1 Love the idea I hate traffic and struggling for parking specially when I go for the dodgers game. This idea will make the games more enjoyable.

Response P647-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P648 – Daisy Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P648

Comment P648-1 This is great. Hopefully it is successful and they expand the program. Create new metro lines in the sky by cable car.

Response P648-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P649 – Angela Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P649

Comment P649-1 I support the gondola, because it a transportation to reduce traffic.

Response P649-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P650 – Raymond Noriega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P650

Comment P650-1 I support the gondola I believe its going to be a quick transportation to get to one place to another.

Response P650-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P651 – Leticia Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P651

Comment P651-1 I support the gondola because my family and I won't need to take our cars and worried about parking when going to the dodgers games.

Response P651-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P652 – Leslie Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P652

Comment P652-1 Doing this dosen't only help fans but also its would reduce traffic around the dodger stadium combining a train ticket with a flying along leaving more space for employees to park inside the stadium.

Response P652-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P653 – Silvano Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P653

Comment P653-1 Great idea and fancy transportation it helps with air pollution.

Response P653-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P654 - Zheng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P654

Comment P654-1 Support Gondola

Response P654-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P655 - Zheng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P655

Comment P655-1 Support Gondola

Response P655-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P656 – Chris Barry

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P656

Comment P656-1 Support! Gondola.

Response P656-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P657 – Ken Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P657

Comment P657-1 I support gondola.

Response P657-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P658 – Amanda Cotylo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P658

Comment P658-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P658-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P658-2 I live very close to Chinatown (and used to live on Chung King Rd) and this seems like a vanity project, an eyesore, and we have no idea about the impact on the environment as well as the residents. I honestly thought it was a joke when I first heard about it, as in "what is the dumbest thing you can conceive that rich people want to do to help ruin Los Angeles" oh I know! Big GONDOLAS over an already over saturated and gentrified area of our city!

Just, NO. STUPID IDEA. Whoever thought this end can go kick rocks. Thx

Response P658-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter P659 – Eddie Barranza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P659

Comment P659-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P659-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P659-2 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P659-2 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization

dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P659-3 Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P659-3 Refer to Response 659-2 for an overview of outreach and community engagement during the Draft EIR scoping period, as well as during the Draft EIR public review period. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment Letter P660 – Brandon Gibbons

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P660

Comment P660-1 My name is Brandon and I was born and raised and longtime resident in Cypress Park. I work at the Eagle Rock Branch Library where you all tried to put your LA Art brochures on our bulletin board. At first, I thought nothing about this. I thought it was a whole new layer to the metro system, that it would be air trains like they have in San Francisco at the SFO and OAK airports. BART is something everyone loves and we should have a Metro like that here in LA. When I found out it was just to only go to see the Dodgers, I thought no way.

Response P660-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding

communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P660-2 I think LA Metro should focus on the transit problems we already have. How come there aren't more train lines to each neighborhood in LA? How come it says gondola transit is popular in other cities when literally I've never heard of these things before besides when people go skiing? I think if you have money for this, you have money for our trains and buses.

Response P660-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P660-3 It's not right that there's only some days the Metro has free fare days. And when people find out about it, it's on social media. That stuff makes a huge difference when you make hourly like me doing something you love because you want to be in the community. If the LA ART which isn't even Rapid Transit because gondolas are slow and this one only goes to one spot, if there's money for something like this, you should use it to benefit everybody and let there be more free fare days.

Response P660-3 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property.

The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Comment P660-4 Change your plans and build something else. I know Metro wants to actually help people get to where they need to go. This one is not the way to do it.

Response P660-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P661 – Danny Orellana

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P661

Comment P661-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a frequent visitor of the LA Historic Park, this will be a terrible addition to the space.

Response P661-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment Letter P662 – Lisa Duardo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P662

Comment P662-1 The purpose of this document is to advocate for the NO PROJECT CEQA ALTERNATIVE.

Response P662-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how environmental benefits of the proposed Project would not be realized through the "No Project Alternative" which fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P662-2 I am born and raised in the Metro Downtown area. I travel the Historic Arroyo Seco Pkwy, North Broadway, Spring, Alameda and Main Streets most of my life enjoying the open space vistas of the San Gabriel Mtns., the Repetto Hills, Santa Monica Mtns (of which Elysian Park is considered part of and a National Parks Service, Rim of the Valley Corridor) and the beautiful skyline of Downtown LA. And I strongly believe that this proposed project would despoil these vistas forever. It is a significant unavoidable adverse impact. And the Draft EIR simply states, "scenic vistas taken under consideration" dismissing or omitting the validity and value of said vistas. But I get ahead of myself. As it is the purpose for this proposed project that I take issue with.

Response P662-2 Refer to Response P662-16 regarding the proposed Project's less than significant aesthetic impacts. Refer to Response P662-3 regarding the need for the proposed Project.

Comment P662-3 ES.2 Project Purpose- Improve mobility and accessibility for the region by providing a daily, high capacity, ariel rapid transit from Los Angeles Union Station to the Dodgers Stadium… The reality is the proposed project is specifically tailored for game days. This use of public land, airspace (what about private property airspace?) and funds for a private venture is stomach-churning. The Daily News recently reported on studies suggesting the opposite of this Draft EIR statement of improved mobility and accessibility. The region could use real transportation solutions for better mobility and accessibility that would improve daily life for a larger population and area than this costly and ineffective proposed project.

Response P662-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing

residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.05 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose.

Comment P662-4 I would like to add my comments to the on-going administrative record.

Having read and looked over the roughly 1100 pages of this Draft EIR over this MLK weekend because this project fell out of mind during the Covid Pandemic where many stakeholders like me were focused on our lives and livelihood and also may not of had access to digital meetings. This Draft EIR, I feel, is biased toward expenditure and construction of the proposed project regardless of the significant impacts with or without mitigation. Below are some of the concerns I have that I feel were not addressed in the Draft EIR or not addressed to a sufficient level of analysis for intelligent decision making. This list is not complete nor listed in numerical order as to importance:

Response P662-4 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P662-5 through P662-36.

Comment P662-5 1. Neighborhood directly negatively effected by LA ART project, Olvera Street, Chinatown, California State Park, William Holmes Public Housing and Preschool, Ann Street Elementary, Cathedral High, Lincoln Heights, Solano Cyn., Elysian Park, Echo Park, Elysian Valley, Downey Park, Albion Park along with the major transportation

roadway corridors of North Broadway, Spring, Alameda and Main streets and possibly parts of the Historic Arroyo Seco Pkwy (Hwy110). Greatest negative impact is during construction over two to five years of six to seven days, morning to evening construction.

Response P662-5 As discussed in Section 2.0, Project Description, of the Draft EIR, construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing. The duration of construction for each component of the proposed Project is set forth in Table 2-4. Working hours would vary to meet special circumstances and restrictions, but are anticipated to be consistent with the City's allowable construction hours of Monday through Friday between 7:00 a.m. to 9:00 p.m. and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m. While not anticipated, approval would be required from the City of Los Angeles Board of Police Commissioners for any extended construction hours and possible construction on Sundays. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. As discussed in the Draft EIR, all impacts during construction, with the exception of noise, would be less than significant or would be reduced to less than significant with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the

proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P662-6 2. LA ART states zero emissions. Omitted are the tables detailing particulates and emissions from construction over two to five years, six to seven days a week from morning till evening. What is the number of construction trucks and heavy machinery necessary to drill, excavate, deliver and haul material and supplies during construction period? How is this then mitigated to a level safe for the surrounding neighborhoods or which a majority is elderly and young families.

Response P662-6 The Draft EIR addressed air quality in Section 3.03, Air Quality, with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR. As shown in Table 3.3-4 (page 3.3-22 of the Draft EIR), maximum daily emissions associated with proposed Project construction would not exceed South Coast Air Quality Management District (SCAQMD) daily thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Tables 4-2 through 4-2 of the Air Quality/Health Risk Assessment Technical Report (Appendix D of the Draft EIR) lists the type and number of heavy-duty construction equipment and haul trucks required during Project construction. Refer to Appendix B, Construction Assumptions, of the Draft EIR, for details regarding the proposed Project construction assumptions.

Comment P662-7 3. Negative Impact through construction roadway closures creating gridlock with vehicles emitting toxic fumes with possible added pedestrian and auto accidents by frustrated drivers.

Response P662-7 Refer to Section 3.17, Transportation, of the Draft EIR for a discussion of Mitigation Measure TRA-B, which requires implementation of a Construction Traffic Management Plan (CTMP) and which would include street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City of Los Angeles for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. Refer to Section 3.03, Air Quality, of the Draft EIR for an analysis of the potential for impacts associated with construction emissions from the proposed Project. That analysis considered emissions associated with site preparation, demolition, grading, utility installation, building, coating, and paving from off-road construction equipment, as well as emissions from on-road mobile equipment associated with workers, vendors, and hauling. As shown in Table 3.3-4, Maximum Mass Daily Emissions Due to Construction of the Project, impacts were found to be less than significant. Furthermore, the Draft EIR analyzed the potential for off-site localized impacts associated with carbon monoxide from vehicle use at intersections impacted by the proposed Project within Section 3.03, Air

Quality, of the Draft EIR. The Draft EIR reported that the highest average daily traffic volumes at an intersection impacted by the proposed Project is expected to be well below the daily traffic volumes that would be expected to generate carbon monoxide exceedances as evaluated in the 2003 South Coast Air Quality Management District Air Quality Management Plan (AQMP) and as such, localized carbon monoxide impacts would be less than significant.

Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety.

Comment P662-8 4. Goldline offers the same mobility and accessibility from Union Station to Chinatown and California State Park currently. So the LA ART is only offering the Dodgers Stadium.

Response P662-8 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P662-9 5. LA ART ticketing and Hub stations are only accessible via a prepaid access ticket purchased on-line. This exclude a large non-digital local population.

Response P662-9 The Draft EIR addressed ticketing in Section 2.0, Project Description, of the Draft EIR. The stations would include areas for ticketing and fare checking. Ticketing for the proposed Project would use either a chip-based card system or electronic ticketing that could be purchased and saved on a personal mobile device. Using these types of technologies would allow for contactless fare checking at the stations. Riders would pre-purchase their ticket prior to entering the boarding platform and fares would be checked using a card reader/scanner. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P662-10 6. Construction staging areas are not listed nor accounted for in the impact reports. These areas will add to the cumulative negative impacts for neighborhoods and other stakeholders and commuter through the large construction area throughout the two to five years of construction.

Response P662-10 The Draft EIR addressed construction staging in Section 2.0, Project Description, with supporting data provided in Appendix B, Construction Assumptions, of the Draft EIR. As discussed in Section 2.08, Construction, and Appendix B, Construction Assumptions, of the Draft EIR, construction staging may occur at the Alameda Station site and the Dodger Stadium property. For Alameda Station, Metro's Lot B, an existing approximately 60-space parking lot in front of the Union Station Terminal and the future location of the planned LAUS Forecourt, may be utilized for construction staging and location of the crane to be used during Alameda Station's construction. The Dodger Stadium property may also be used for construction staging, including for staging of the gondola system. Construction staging would include construction trailers for construction management use with corresponding parking for construction management, use during construction hours, and a laydown area. Proposed Project construction, including potential construction staging areas, are analyzed in the Draft EIR, including in Section 3.03 Air Quality, Section 3.08, Greenhouse Gas Emissions, and Section 3.13, Noise. Construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing.

Comment P662-11 7. Proposed construction schedule lists approximately 2+ years per Hub (3) and Tower (3) with the hope that some sites can run concurrently. Regular construction days – Monday – Friday 6AM-9PM, Saturdays and Holidays 8AM-6PM and Sundays when necessary. This is a unavoidable significant adverse impact to all living people and wildlife in the area.

Response P662-11 Based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, the proposed Project would only result in significant and unavoidable impacts with regard to: Noise and Vibration: i) Construction Noise – Project-level and cumulative noise impacts to noise sensitive receptors from on-site construction activities. ii) Construction Vibration – Project-level and cumulative human annoyance vibration impacts to adjacent sensitive receptors. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As summarized in the Executive Summary of the Draft EIR, the proposed Project would have less than significant impacts related to construction with the exception of Noise and Vibration (human annoyance). Detailed analysis is provided in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR, for a discussion of how construction of the proposed Project would not result in significant impacts to biological resources or would result in less than significant impacts to biological resources with mitigation.

Comment P662-12 8. The majority of agencies, organizations public or private commented via a boiler plate response to adhere to laws and regulations or requesting further updates us up to dates.

Response P662-12 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P662-13 9. 10- omits the real unavoidable adverse cumulative impact of Noise, dirt, particulate matter, vibrations, light pollution, despoiling of viewshed, increase gridlock, risk of accidents during construction and operation of LA ART.

Response P662-13 The Draft EIR addressed cumulative impacts in Section 5.0, Other CEQA Considerations, of the Draft EIR. As discussed therein, the proposed Project would result in significant and unavoidable cumulative impacts with regard to: Noise and Vibration: i) Construction Noise – Project-level and cumulative noise impacts to noise sensitive receptors from on-site construction activities. ii) Construction Vibration – Project-level and cumulative human annoyance vibration impacts to adjacent sensitive receptors. As discussed in Section 3.13, Noise, the proposed Project would not result in any significant and unavoidable operational noise impacts. As discussed in Sections 3.01, Aesthetics, 3.03, Air Quality, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would otherwise not have significant and unavoidable construction and operational impacts.

Comment P662-14 10. LA ART will not eliminate the operation of the Dodgers Stadium Express buses that offer free transportation on game days from Union Station to Dodgers Stadium.

Response P662-14 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment P662-15 11. There is no benefit to the residents, businesses or visitors to this area, Chinatown, Olvera Street, California State Park, Elysian Park that is worth the financial, environmental and quality of life cost this project proposes.

Response P662-15 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment

Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Response P662-11 for an overview of the proposed Project's potential environmental impacts. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P662-16 12. ES-13/AES-1, -2,-3,-4, The Draft EIR disregards or downplays the significant negative impact to the despoiling of iconic Los Angeles vistas/viewsheds of the Downtown City Skyline, the hillsides of National Parks Service Rim of the Valley Corridor including the San Gabriel Mtns. The 150' plus Hub Stations and Towers with massive gondola cables will cut right through the open space and despoil vistas and sky views. No mitigation possible.

Response P662-16 Refer to Section 3.01, Aesthetics, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The proposed Project would also enhance the public realm, aesthetic lighting/signage, connections to open space, transit, and community facilities. As such, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the impact would be less than significant. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of the Rim of the Valley. While the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate I-5.

Comment P662-17 13. AIR-3, The Project area includes within ¼ mile California State Park where families and seniors recreate, Elysian Park, Downey Park, Albion Park, established housing both private and public (Blossom Plaza, William Holmes Public Housing, Catholic High School, Temples, and Churches, Elementary and Preschools, the residential neighborhoods of Chinatown, Solano Canyon, Elysian Valley, Lincoln Heights, Arts District but any impact is deemed insignificant and so no mitigation is offered.

Response P662-17 The Draft EIR addressed Air Quality in Section 3.03 Air Quality with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, including potential impacts to sensitive receptors, such as residents, daycare children, school children, and senior centers. As shown in Table 3.03-4 through 3.03-8 (page 3.03-22 through 3.03-26 of the Draft EIR), Project construction and operation would not exceed applicable thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J,

Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P662-18 14. AIR-4, Population directly effected may not have been informed of the health dangers of GHG, large and nano dust or particulate matter produced during the two to five years of construction . Project does not offer any mitigation to this issue.

Response P662-18 The Draft EIR addressed Air Quality in Section 3.03, Air Quality, with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report. As shown in Table 3.03-4 through 3.03-8 (page 3.03-22 through 3.03-26 of the Draft EIR), Project construction and operation would not exceed applicable thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, for discussion of the proposed Project's potential greenhouse gas emissions impacts. As discussed in Section 3.08, the proposed Project would result in less than significant impacts with respect to greenhouse gas emissions, and no mitigation is required pursuant to CEQA Guidelines section 15126.4. As described in Section 2.0, Project Description of the Draft EIR, proposed Project construction is anticipated to take approximately 25 months.

Comment P662-19 15. CUL-1, areas effected but downplayed are Elysian Park, California State Park and Historic Arroyo Pkwy. The parks are used for many cultural events and ceremonies where open sky and open space is valued and enriches the cultural purposes.

Response P662-19 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to

Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P662-20 16. GHG-1 , Again, the number of construction vehicles and machinery over five years, 7 days a week will make a negative adverse impact. No mitigation is offered.

Response P662-20 Refer to Response P662-18 for discussion of how the proposed Project's potential greenhouse gas emissions impacts, which would be less than significant, and how proposed Project construction is anticipated to take approximately 25 months.

Comment P662-21 17. NV-1, No mitigation offered for Noise during the construction and operation. It is assured that that construction and operation will create noise and some of it will be negative.

Response P662-21 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. Operational noise impacts would be less than significant and therefore no mitigation would be required.

Comment P662-22 18. NV-2, Draft EIR validates unavoidable during four plus years of construction, seven days a week, morning to night. The suggested mitigation offered is to install monitoring devices with no other mitigation to alleviate impact.

Response P662-22 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. Construction of the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project even with implementation of Mitigation Measures VIB-A and VIB-B. As discussed on page 3.13-72 of the Draft EIR, "[s]ince the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction, there is no feasible method for mitigating human annoyance impacts. It should be noted that because the human annoyance threshold is so low it is already exceeded on roadways by existing truck trips." Such equipment is needed to build the proposed Project and there is no alignment or haul route option that would create sufficient separation from adjacent uses to eliminate the human annoyance impact. The Draft EIR thus included a complete analysis of vibration impacts as required by CEQA. Refer to Section 2.08, Construction, in Section 2.0,

Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing. The duration of construction for each component of the proposed Project is set forth in Table 2-4. Working hours would vary to meet special circumstances and restrictions, but are anticipated to be consistent with the City's allowable construction hours of Monday through Friday between 7:00 a.m. to 9:00 p.m. and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m. While not anticipated, approval would be required from the City of Los Angeles Board of Police Commissioners for any extended construction hours and possible construction on Sundays.

Comment P662-23 19. POP-2, Housing, studies prove that this type of attraction will increase pressure on the existing housed population of renters and property owners by increasing rental prices and seeding property sales at higher rates making housing area unaffordable for existing elder and working class families.

Response P662-23 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P662-24 20. PR-1, despoils both California State Park and Elysian Park. No mitigation offered.

Response P662-24 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park and Elysian Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P662-25 21. PR-2, Negative impact by construction and operation to direct and adjacent areas to California State Park, El Pueblo, Union Station, Pocket Park on Alameda & Main.

Response P662-25 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As

discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment P662-26 22. PR-3, Construction and operations travel directly overhead by 100 feet or more to the Goldline, Alameda, College, Broadway and the Historic Arroyo Pkwy (110 Fwy). No mitigation offered.

Response P662-26 The Draft EIR analyzed the potential construction and operational impacts of the proposed Project, including in relation to the portions of Metro's L (Gold) Line, Alameda Street, College Street, North Broadway, and the SR-110 within the Project area. Refer to Response P662-25 for discussion of how construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance), and the proposed Project would not result in any other significant and unavoidable construction impacts, and would not result in any significant and unavoidable operational impacts. In addition, refer to 3.01, Aesthetics, of the Draft EIR, for a discussion of how construction and operation of the proposed Project would result in less than significant impacts with respect to scenic resources, public views, and would not create a new source of substantial light or glare that would affect views. Refer to Section 3.17, Transportation, of the Draft EIR, for a discussion of how construction and operation of the proposed Project would result in less than significant transportation impacts with implementation of mitigation.

Comment P662-27 23. TRA-4, Broadway, Spring, Alameda, Main Streets and 110 Fwy are all major emergency corridors for the area. No substantial mitigation offered.

Response P662-27 Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. With implementation of a Construction Traffic Management Plan as outlined in Mitigation Measure TRA-B, and the Temporary Disaster Route Plan as outlined in Mitigation Measure TRA-C, adequate emergency access would be maintained in and around the proposed Project alignment and component sites throughout all construction activities and impacts would be less than significant with mitigation. Operational impacts would be less than significant.

Comment P662-28 24. TCR-1, California State Park programs & provides space for Native and cultural events that honor natural environments and open space (land and sky). LA ART would despoil this open atmosphere forever.

Response P662-28 The Draft EIR addressed Tribal Cultural Resources in Section 3.18, Tribal Cultural Resources. Metro consulted with California Native American Tribes as required by CEQA in accordance with Assembly Bill 52. Upon implementation of Mitigation

Measures CUL-A, CUL-D, and TCR-A, potentially significant impacts related to tribal cultural resources would be reduced to less than significant under the proposed Project. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment P662-29 25. TCR-2, Same as TCR-1.

Response P662-29 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Response P662-28 for discussion of the Draft EIR analysis of Tribal Cultural Resources.

Comment P662-30 26. WFR-1, The project offers zero plan for rescuing human life when a gondola/ cable accident occurs whether it is a gondola falling or a stalled or unresponsive machinery operating gondola.

Response P662-30 Refer to Section 3.20, Wildfire, of the Draft EIR for discussion of the proposed Project's potential impacts to wildfire, which would be less than significant, including with respect to the implementation of emergency evacuation plans. Refer to Section 3.15, Public Services, for a discussion of how impacts related to fire protection services during proposed Project operation would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. The proposed Project is unlikely to become inoperable due to a system malfunction. The proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload passengers from the system. The proposed Project would also include routine maintenance that would be performed by the system operator, and

the overall system would be observed on a daily basis as part of the startup routine. Additionally, the proposed Project would include the installation of backup battery storage at each station, tower, and junction, as needed, to provide backup power to allow unloading of the system in the event of a power grid failure. An Emergency Operations Plan would be prepared as part of the proposed Project and would set forth guidelines for a wide range of scenarios. The Emergency Operations Plan would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD). The purpose of the Emergency Operations Plan would be to determine appropriate actions in advance of situations that could impact the operation of the proposed Project. Examples of scenarios for consideration by the Emergency Operations Plan could include fires, earthquakes or other natural disasters, or a system failure of the proposed Project. In addition, an Evacuation Plan would be developed as part of the Emergency Operations Plan.

Comment P662-31 27. WFR-5, Gondola will trave above homes, apartments, businesses, parks and open spaces, roadways and a historic highway.

Response P662-31 Refer to Section 3.20, Wildfire, of the Draft EIR for discussion of the proposed Project's potential to increase the risk of wildfires, which would be less than significant. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P662-32 28. 3.1.2.3, Scenic Resourses, Historic Arroyo Pkwy is listed in many digital and printed maps as a scenic highway from Downtown to Pasadena.

Response P662-32 As discussed in Section 3.01, Aesthetics, of the Draft EIR, while the Arroyo Seco Parkway/SR-110 is a National Scenic Byway and a California Historic Parkway, the SR-110 is not an officially designated State scenic highway, as determined by Caltrans' Scenic Highways – Scenic Highway System List. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR, for information on the definitions of and criteria for National Scenic Byways and California Historic Parkways.

Comment P662-33 29. 3.1.2.4, Example of Light and Glare already exist in LA ART area is not a valid reason for the use of No Impact/ Insignificant. There is cumulative Light and Glare Impact to address and/or mitigate.

Response P662-33 As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Project area is a developed, urban area with a high amount of existing ambient lighting. The high levels of ambient lighting exist due to vehicular and pedestrian street lighting, building security lighting, outdoor landscaping lighting, and lighting along and adjacent to the various dedicated transit guideways traveling to Los Angeles Union Station (LAUS), such as the elevated Metro L Line (Gold). In addition, high levels of ambient lighting are exhibited from vehicle and truck headlights traveling on streets and the SR-110. Cathedral High School currently has high-poled sports field lighting visible from North Broadway, Los Angeles State Historic Park, and area residents when in use. Dodger Stadium has extensive television quality sport field lighting in use during games and special events. Large special events which occasionally occur at the Los Angeles State Historic Park can also generate high levels of lighting. The lighting for the proposed Project would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, and towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queuing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and mobility hubs would be installed at the stations, junctions, and towers. Lighting would also be provided underneath the elevated stations and junction. Impacts to light and glare from operations of the proposed Project would be less than significant. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Section 5.0, Other CEQA Consideration, for analysis of the proposed Project's cumulative impacts. As described in Other CEQA Considerations, cumulative impacts with respect to light and glare would be less than significant.

Comment P662-34 30. 3.1.6 Existing view South Entrance to California State Park will have an extensive negative impact and change forever the visual elements to the park and surrounding environment. This area consists of a Chinatown Hub , a Park Tower and heavy cables with gondolas.

Response P662-34 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on City-owned property and would not be located at the south entrance to the Los Angeles State Historic Park.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. There are no designated scenic vistas present in the area of potential impact, but the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Views considered to be scenic locally would not be substantially impacted by the proposed Project, and while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Specifically regarding the proposed Project's cables and cabins, the location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system, the cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area. Further, while certain southwest-facing views of the downtown Los Angeles skyline from Los Angeles State Historic Park, particularly views close to the proposed Chinatown/ State Park Station would be partially interrupted due to the proposed Project, the view from most locations in the Park would be uninterrupted by the proposed Project. These views include looking towards downtown from the southwestern corner and from the Roundhouse platform and walkway within the park. In addition, existing views of downtown from other areas within the Park are already interrupted under existing conditions by trees and intervening development Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park, and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the Park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Chinatown/State Park Station. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, the Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and the design would complement the existing buildings in the Project area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by proposed Project riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los

Angeles State Historic Park. Further, the pedestrian access enhancements in LU-3 between Metro's L Line (Gold) Chinatown Station and the Chinatown/State Park Station would acknowledge the visual character of existing park amenities. As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on Los Angeles State Historic Park, including reducing the size and scale of the station, integrating the existing historic granite pavers, and carefully considering the optimal location for the station. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding ropeway cable design for the gondola cabins. Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Comment P662-35 31. Hubs and Towers will shade and block sunshine to residents, businesses , street populations, visitors to State Park and it is downplayed with no mitigation suggested.

Response P662-35 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including shading, which would be less than significant. Refer to the Shade/Shadow Diagrams, included in Appendix C, Visual Impact Assessment, of the Draft EIR, for the shade/shadow diagrams prepared for the proposed Project. As discussed in Section 3.01, Aesthetics, of the Draft EIR, while shading is not a required analysis area in the CEQA Guidelines, shade diagrams were created in accordance with recommendations in the Los Angeles CEQA Thresholds Guide (2006) for Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State Park Station, Broadway Junction, and Stadium Tower. The Draft EIR concluded that shadow impacts would be less than significant and, therefore, no mitigation measures are required.

Comment P662-36 32. Again, Air Rights to the public right of way , businesses, and residents, LA ART has not addressed leasing or mitigation for the use of the rights to keep airspace open and safe from possible harm to persons or property.

Response P662-36 Refer to Topical Response N, Environmental Justice, for discussion of how no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. As described throughout the Draft EIR, the proposed Project would require aerial

easements for certain properties along the proposed Project (see Sections 2.05 of Section 2.0, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P662-37 Thank you for admitting my document letter with my comments to the LA ART Draft EIR

Signed here with my typed name and todays date and time,

Lisa Duardo, January 17, 2023 3:47PM in Los Angeles.

Response P662-37 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P662-2 through P662-36.

Comment Letter P663 – Fa Li Xiao

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P663

Comment P663-1 Please do not build this gondola in our neighborhood. It will only bring more traffic to Chinatown, not less. It's supposed to make it easier to go to see Dodgers Stadium.

Response P663-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment P663-2 But I do not see that. I see more people will come to take the gondola, leave their trash like they always do when there is a baseball game, and then leave.

Response P663-2 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P663-3 The Dodgers already does not bring more business to Chinatown, where all our business are dying. I do not see how this gondola will make it any different. It's like you planned it without knowing the neighborhood at all.

Response P663-3 Refer to Response P663-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P663-4 When Dodgers games happens, people park everywhere, people cannot drive, people cannot cross the street, people are very loud with their music and parties, and then they drink and leave trash everywhere. They do this when there is concerts at the big park on broadway too. If you make the gondola, it will just be more of the same thing. You have to listen to us, the people who live here. Please do not build this gondola in our neighborhood.

Response P663-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide improved access to Los Angeles State Historic Park and Elysian Park. Refer to Response P663-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P663-5 I t will be very bad and you will regret it and then you will waste money to take it down.

Response P663-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Responses P663-1 through P663-4 for responses to comments contained in this letter. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P664 – Kikei Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P664

Comment P664-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

As a daughter of immigrants who frequents Chinatown for necessities and community, I will be impacted by this project. I am concerned about this project for the following reasons:

Response P664-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P664-2 through P664-11.

Comment P664-2 Built Environment:

The Gondola Project's enormous towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P664-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan, included as Appendix B of the Lighting Study, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local artists. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the proposed Project's system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P664-3 Traffic:

The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P664-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P664-4 The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the

surrounding communities. The existing traffic conditions are already difficult because of [explain traffic hazards, conditions, etc.] and this project will make it worse.

Response P664-4 Refer to Response P664-3 for a discussion of how CEQA does not require traffic congestion to be analyzed in the Draft EIR.

Comment P664-5 Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P664-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P664-6 Environmental Justice:

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P664-6 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P664-7 Gentrification:

This project will lead to displacement and increase the cost of rent in the area.

Response P664-7 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding

neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P664-8 Future development:

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P664-8 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P664-9 Lack of transparency:

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P664-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the

proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P664-10 We never asked for this project. We don't need or want this project.

Response P664-10 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's commitments to features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment Letter P665 – Rodney Scholtes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P665

Comment P665-1 I'm sending you this email to let you know I am opposed to the creation of a gondola as public transportation.

Response P665-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P665-2 It will be a terrible thing for those who have lived in the neighborhoods it will fly over, eliminating their privacy.

Response P665-2 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and as discussed in Topical Response M: Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P665-3 It also seems rather ridiculous as a means of transportation to help a very few. LA Metro needs to rethink its bus system to and from the stadium.

Response P665-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium

draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P665-4 Get a fleet of electric busses for the environment, make a dedicated lane in and out of the stadium for the busses, even if you have to remove parking on Sunset for game days.

Response P665-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Topical Response H, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Moreover, the Transportation Systems Management Alternative is not a permanent transit connection as bus routes, and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Comment P665-5 If McCourt really thinks the gondola is the way to access his private property, and build retail, entertainment and housing on his parking lots, he needs to use his own money to build the gondola, and he needs to lease the airspace from the citizens that will be effected.

Response P665-5 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.05 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR.

Comment P665-6 I am a Dodger fan and I attend 25 plus games a season, I drive from the San Fernando Valley, and have also used the bus from Union Station on a very few occasions.

Response P665-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P665-7 Maybe a better idea is for Mc Court to sell all the parking lot land to LA City, and let us as citizens profit from the revenue, and look at better options for getting to and from the stadium.

Response P665-7 Refer to Response P665-3 through P665-5 for a discussion of the purpose and need for the proposed Project, the Project Sponsor, costs and financing, and consideration of alternatives to the proposed Project.

Comment Letter P666 – Diane M. L. Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P666

Comment P666-1 I am a longtime civil rights and community advocate. I am a volunteer in L.A. Chinatownand actively involved in various community and professional organizations.

Response P666-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P666-2 After reviewing the Draft Environmental Impact Report (DraftEIR) regarding the proposed Los Angeles Aerial Rapid Transit Project, it seems that Los Angeles County Metropolitan Transportation Authority(Metro) is going to great lengths to support and condone the proposed aerial gondola system project connecting Union Station and the Dodger Stadium property by the private entity, Los Angeles Aerial Rapid Transit Technologies LLC, which apparently is subject to change.

Response P666-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P666-3 Such project will seriously harm and have significant, permanent and irreversible adverseeffects on the residents, small businesses, and others, as well as the environment,aesthetics, preservation, and sustainability of the surrounding communities, suchas Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the LosAngeles State Historic Park.

Response P666-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Chinatown, Mission Junction, Elysian Park, Solano Canyon, and Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable

aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P666-4 Justbecause there are aerial transit systems in the few cities and countriesreferred to in the Draft EIR, does not justify the construction and operationof an unnecessary, extremely costly, and unwelcomed aerial transit system in theproposed areas of Los Angeles.

Response P666-4 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P666-5 It is clearly wrong to allow a private entity to permanentlytake-over public air space and various public and privately-owned properties tonegatively gentrify these urban areas by creating a visually and physically objectionablenuisance mainly for profit in order to cater to a few. Such proposed project will establish an extremely badprecedent if this public entity and potentially other public entities areallowed to acquire extensive public air space and public properties for privategain and in order to exploit and harm minority and low-income neighborhoods.

Response P666-5 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR

for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P666-6 This proposed project does not and should notqualify as "the first environmental leadership transit project under SenateBill 44."

Response P666-6 Refer to Topical Response A, SB 44, for discussion of how the proposed Project qualifies as an "environmental leadership transit project" under SB 44.

Comment P666-7 In addition, such proposed project will not significantlydiminish traffic, air and noise pollution or ensure public safety on a short-termor long-term basis. In fact, the oppositeprobably will occur with the construction of such proposed project and changingof the areas with access to the aerial gondola into a huge parking lot primarilyfor the proposed project's benefit, while creating and causing significant andserious traffic, air and noise pollution, public safety concerns, and otheradverse impacts.

Response P666-7 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by

connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, operational noise impacts would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how system components would be equipped with security features for system safety. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P666-8 This proposed project is a substantial waste of taxpayers'money and natural resources, and fails to sufficiently and permanently protect the environment,as well as the residents, small businesses and others in the communities thatare adversely affected. Thesecommunities do not need an amusement park ride, like this proposed aerialgondola, but more appropriate, safe and affordable public transportation, low-costhousing, and culturally-sensitive and necessary community businesses and services,for the people.

Response P666-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P666-9 The findings in the Draft EIR pursuant to the evaluation ofthe potential environmental effects associated with the construction andoperation of this proposed project as having "no impact," "less than significantimpact with mitigation" or "less than significant" impact, are inaccurate, unsubstantiatedor unreasonable and unfair. This proposedproject should be denied due to its potentially significant, substantial andirreversible adverse environmental effects.

Response P666-9 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in

the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment Letter P667 – Samantha Mohammad

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P667

Comment P667-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P667-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P667-2 As a resident of Los Angeles County and as a physician I believe the greater LA community will be impacted by this project. I am concerned about this project for the following reasons:

Response P667-2 This comment provides a general introduction to comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P667-3 through P667-10.

Comment P667-3 Gentrification:

This project will lead to displacement and increase the cost of rent in the area. This is will greatly affect the surrounding areas that currently house many low income residents. By using resources to create this gondola you are actively saying you care more about the Olympics than caring for our unhoused neighbors as this money could be funneled into affordable housing instead.

Response P667-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. As discussed in Topical Response E, no funding for housing would be used for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which would provide the first permanent transit connection to Dodger Stadium, one the region's most visited venues.

Comment P667-4 Environmental Justice:

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions. They will also displace traffic onto already underserved areas with poor resources worsening air quality.

Response P667-4 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Further, the proposed Project would address a need for a permanent transit connection to one of the region's most visited venues and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P667-5 Traffic:

The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community. The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult

because of [explain traffic hazards, conditions, etc.] and this project will make it worse.

Response P667-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Response P667-4 for discussion of how traffic congestion is not required to be analyzed in the Draft EIR under CEQA.

Comment P667-6 Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P667-6 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic and cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P667-7 Future development:

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P667-7 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial rapid transit system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P667-8 Lack of transparency:

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P667-8 This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response P667-9 for discussion how Metro sought to engage the community in each stage of the environmental review process.

Comment P667-9 Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P667-9 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P667-10 We never asked for this project. We don't need or want this project.

Response P667-10 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's commitments to features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment Letter P668 – Brandy Jimenez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P668

Comment P668-1 My name is Brandy and I was born and raised in Lincoln Heights. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P668-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P668-2 The Gondola Project's towers will ruin our views, and the gondola cars will be used for advertising and electronic billboards that we do not want in our skyline. You would not build this kind of thing in Beverly Hills or Santa Monica. But you would do it here where working class Asian and Latino families are fighting for their lives.

Response P668-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included as

Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local art collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities.

Comment P668-3 It will also displace traffic from the Stadium area to the Chinatown, Dogtown, Downtown, and Lincoln Heights areas. Our neighborhoods will receive worse air quality impacts from tailpipe emissions in our already overburdened communities. This is wrong and your oversight on this shows how greedy you are in wanting to build this gondola at the expense of the people's health.

Response P668-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately

burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P668-4 The gondola will also ruin impact historic, cultural, and communal resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument and Olvera Street. It is wrong that you've gone through our Olvera Street and Lincoln Heights businesses to make workers sign support letters without educating them on the impacts of the project. How can you do that to people? That says everything about the project, that you would lie to everybody and ruin the historic character of LA to build this vanity project.

Response P668-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, Los Angeles Union Station (LAUS), and El Pueblo, in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los

Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment P668-5 Not only that but the gondola will lead to displacement and increase the cost of rent in the area. It will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community. If you actually listened to the community, you would know that we need renter protections, we need small business stimulus, we need free transit. How long have people been asking for free transit? If you asked what people wanted from LA Metro, you wouldn't hear anyone say a gondola.

Response P668-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Also refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Further, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P668-6 Come to your senses and kill this project. Unless you have some free shuttles and free bike lending systems to come through with, stay out of our neighborhoods.

Response P668-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. As discussed in Section 5.0, Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response C, Project

Features, for a discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment Letter P669 – Allen Natian

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P669

Comment P669-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a transit and walkable city advocate, I strongly urge you to object this project. It does not solve traffic while wasting money. Sure it's private money but the residents impacts will be not worth this gondola spectacle. There has been little public outreach and therefore feels sketchy.

Response P669-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P669-2 In addition, The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P669-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P669-3 This will also make gentrification worse.

Response P669-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P669-4 If you want less traffic and better transit, a gondola is not the answer. Better transit is. Please side with the people, not a billionaire.

Response P669-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P670 – Sarah Kate

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P670

Comment P670-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I am an avid Dodgers fan and usually drive to the games and park in the stadium. I saw that the gondola would be built on top of the parking lot, taking parking away from people. How will that help the situation? Especially since the plan doesn't even include additional parking.

Response P670-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project’s potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P670-2 If I'm coming from Los Feliz, I'm not going to drive to Union Station to board the gondola and then go into the Stadium. And then what? Wait in a Disneyland style line to get back on the gondola to get to my car at Union Station? That doesn't make sense. I feel like the people who planned this have a fundamental misunderstanding of Los Angeles. We drive places. We don't gondola places.

Response P670-2 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment Letter P671 – Eric Adams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P671

Comment P671-1 First and foremost, leaving off Frank McCourt's desire to build The Grove-Chavez Ravine from the report is reprehensible. Everyone working on this dishonest proposal should be ashamed of themselves.

Response P671-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment P671-2 Secondly, calling this project a "public transit" project is majorly deceptive since the project is not public, nor does it behave as transit. It is an attraction, and should be labeled that way.

Response P671-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P671-3 And thirdly, Chavez Ravine and the surrounding areas have been raped more than enough times. No more. We are paying attention to those of you working on this disgusting boondoggle.

Response P671-3 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P672 – Ashley Evangelista-Mendiola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P672

Comment P672-1 I am writing to voice my opposition to the Los Angeles Aerial Transit Project (" The Gondola" at Dodger Stadium) I am a resident of Solano Canyon. I am concerned with how the project will be paid for if the project goes over budget.

Response P672-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P673 – Jennifer Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P673

Comment P673-1 I am a resident of Echo Park and I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I have four concerns.

First, I am extremely concerned that the DEIR process has not been sufficiently transparent. I would like to know why there have been no public information sessions physically IN CENTRAL CHINATOWN that would allow residents, business owners and neighbors like me to attend. The public information sessions that have been held in late 2022 and early 2023 have been at Union Station, at Cathedral High School, and on Zoom. These sessions have excluded those who cannot easily walk to Union Station or Cathedral High School, well outside of downtown Chinatown, and those who do not have easy access to computers. These sessions have completely excluded those who will be impacted the most by this project.

Response P673-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar, to accommodate agencies, interested parties, and organizations who were unable to attend the meetings held in person. Both Los Angeles Union Station and Cathedral High School are along the proposed Project alignment. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and

Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P673-2 I am outraged that the public comment process has been so incomplete and so opaque. How is it possible that LA Metro has been completely unable to hold a public information session IN CHINATOWN, while at the same time using promotional materials that advertise Chinatown as a backdrop? This is unacceptable. This shoddy approach to reaching residents of Chinatown demonstrates arrogance and cynicism on the part of LA Metro and Frank McCourt. LA Metro has not shown so far that it is capable of gathering public input for this project. Thus far, this is a project being undertaken without knowledge of the communities it will impact, and without gathering sufficient input from these communities.

Response P673-2 Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project..

Comment P673-3 My second concern is the aggressive construction timeline: the Executive Summary states construction could begin in 2024 and take 25 months. It is obvious that though it is not stated, the goal of the timeline is to get the gondola in place in time for the 2028 LA Olympics. This rushed timeline could explain why the public outreach has been so frankly lame. The timeline makes it appear that LA Metro places no value on conducting an honest and thorough public comment process.

Response P673-3 Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project. The Draft EIR addressed construction duration in Section 2.0, Project Description, with supporting data provided in Appendix B, Construction Assumptions, of the Draft EIR. Construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing.

Comment P673-4 My third concern is the complete lack of clarity around funding for this project. It is unclear how much of the bill will be footed by McCourt, and completely unclear what the timeline for his funding will be. Will funding for this project eventually end up on LA taxpayers? LA Metro and McCourt need to supply much more detailed information about the funding for this project.

Response P673-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P673-5 My fourth concern is one of safety of riders. The Executive Summary states that the gondola will operate from 6am - 12pm, and that it will be operated remotely. How will riders be protected, especially after dark, when the gondola is being operated? There have been numerous security issues after Dodger games, when fans who have been drinking get into conflicts. How will this issue be handled aboard the gondola? Since the pandemic, Metro has struggled to regain riders it has lost, due to dangerous conditions on trains regarding individuals who are mentally unstable, open drug use, and lack of personnel to address and contain these issues. How does Metro plan to maintain safe conditions for its riders aboard the gondola, and in gondola stations? What would make the gondola stations any different from any other Metro stations in this regard?

Response P673-5 Refer to Topical Response J, Gondola Design and Operations, for discussion of passenger safety and Section 2.0, Project Description, of the Draft EIR. The proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. Stations would be secured nightly by closing the vertical access to the platforms. Security monitoring would be provided by staff and by cameras, which would feed into the system control room at Dodger Stadium

Station. Each station would be staffed at all times during operations. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P673-6 I am disappointed in the lack of true outreach to affected neighborhoods, and I strongly oppose this gondola project.

Response P673-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project.

Comment Letter P674 – Sherin Bennett

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P674

Comment P674-1 I'm writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project. I live in Los Feliz, work downtown, and visit Elysian Park and LA State Historic Park often on my bike. I go to Echo Park often. I'm a bike rider and public transit commuter. The gondola will negatively impact Los Angeles in many ways, including:

Response P674-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P674-2 through P674-4.

Comment P674-2 - Increasing traffic around Chinatown and Union Station by pushing it away from Dodger Stadium. The existing traffic conditions in Chinatown and around Union Station are already crowded and chaotic, and this project will make it worse. It will also bring more traffic emissions to Chinatown.

Response P674-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P674-3 - The Gondola project's towers will obstruct park views in Elysian and LA State Historic Park, and this project will significantly impact LA State Historic Park, a much-needed green space in the area.

Response P674-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Los Angeles State Historic Park and

Elysian Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, Los Angeles Union Station (LAUS), El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P674-4 There are so many better options than this invasive Gondola. I want Metro to fund *real* public transit options to Dodger Stadium that will not displace or harm existing communities. Create a safe route to bike or walk from the Chinatown metro stop to Dodger stadium, and provide secure bike parking at the stadium.

Response P674-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the

quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter P675 – Jaime Zavaleta

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P675

Comment P675-1 I have lived and worked in Los Angeles all 30 years of my life. I hate that we are a car-centric city with such poor public transportation. But a gondola is the last solution I would ever come up with to address that. Literally. I would come up with a catapult, or a human slingshot, or the cannon from the Medieval Times backlot before I came up with a gondola. It's like— did you even go to engineering school?

Response P675-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P675-2 Don't build this gondola because it will displace working class communities and you have no concept for socioeconomic displacement and how the history of transit construction, freeways, and redlining all plays into that. Don't build this gondola because it will make you look like a fool.

Response P675-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P675-3 Have you addressed that in your little environmental report? What do you mean there's no significant impact made by this project? There's significant impact already on my brain just from watching you guys try to justify this. Oh an "innovative" way to travel is coming to Los Angeles. Excuse me? The lime scooters that middle schoolers street race on down 6th St is more innovative than this. How will LA ART compensate the public for the shoddy lies they've told and time they've wasted on the community for all this.

Response P675-3 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in

other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P675-4 Maybe you should take a hint from the rest of LA and take some acting classes. You sure need some since you're not very good at pretending this is a good idea either. Clearly you are not meant for transit planning, Mr. Cory Zelmer. Upright Citizens Brigade has open enrollment. I suggest that.

Response P675-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P676 – Tabatha Yelos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P676

Comment P676-1 I am writing to express my opposition to the Dodger Stadium Gondola project. I have several concerns about the Draft EIR.

Response P676-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P676-2 through P676-11.

Comment P676-2 My first issue concerns AECOM, the company that prepared the Draft EIR. This company was selected and paid by Frank McCourt and LAART and thus, it is natural that the findings in the EIR would favor the interests of the developer. Every category was found to have "less than significant" impacts despite concerns from the community. I fear that the evaluations in the EIR contain a deep bias in favor of the developer. *Metro should work with the community to select an unbiased entity to conduct the EIR.*

Response P676-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the

public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. AECOM was selected from Metro's roster of environmental consultants. Further, consistent with the requirements of CEQA, Metro has and will independently review, evaluate, and exercise its judgment over the proposed Project's environmental review and EIR. The Draft EIR that was circulated reflects Metro's independent judgment.

Comment P676-3 *Air Quality*

The Air Quality analysis found that the project would reduce VMTs and therefore decrease emissions. I find this hard to believe. As mentioned repeatedly by the community, the project would simply offset the VMTs to another location: either the station at Union Station or the station in Chinatown. People would still have to travel from all over Los Angeles to get to the gondola. The analysis does not account for first and last mile(s - in this case) traveled and therefore I fail to see how the overall emissions would be significantly reduced.

Response P676-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting

new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Section 3.17, Transportation, with supporting information provided in Appendix N, Transportation Appendices, of the Draft EIR, for a discussion of how model development and calibration took into account the relationship between zip code of origin (and its transportation variables such as travel time and cost for driving compared with riding transit) and the resulting mode choice decision for an attendee at a sporting event. As discussed on page 3.17-28, data to calculate trip length for the Draft EIR's VMT analysis also included the share of vehicles destined for Dodger Stadium by zip codes within a 50-mile radius of Dodger Stadium on game days during the Dodgers' 2019 season. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P676-4 *Energy Analysis*

Again, in this section the project claims to reduce VMTs without showing how exactly that will happen. The VMTs will simply be displaced to the gondola stations instead of reduced. Further, this analysis claims that the project will increase public transit ridership. This is a broad claim that seems to be based solely on the fact that people will ride the gondola to the stadium, but does not acknowledge that there is no

first/last mile(s) solution included in the project and people will still need to drive to the gondola station in order to take it.

Response P676-4 Refer to Response P676-3 for a discussion of the proposed Project's transportation modeling. Refer to Section 3.06, Energy, with supporting data provided in Appendix H, Energy Technical Report, of the Draft EIR, for an analysis of the proposed Project's potential energy impacts, concluding that construction and operation of the proposed Project would result in less than significant energy impacts. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of how the proposed Project will connect LAUS, southern California's primary transportation hub, to Dodger Stadium. LAUS provides local and regional access via multiple modes of transport and service providers, such as Metro, Metrolink, Amtrak, and municipal and private bus operators, all of which converge at the station. Accordingly, the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P676-5 *Greenhouse Gas Analysis*

This analysis claims that GHGs will be reduced because people will not be driving to Dodger Stadium. Again, the analysis fails to acknowledge that the project does not include a first/last mile(s) solution. A lot of Dodger fans live in the San Fernando Valley and in unincorporated East Los Angeles. How will these people get to and from the gondola? The GHGs will be offset, but I fail to see how they will be reduced.

Response P676-5 Refer to Response 676-3 for a discussion of model development and calibration to determine the proposed Project's VMT reductions. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D,

Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P676-6 *Land Use and Planning Analysis*

Contrary to the analysis, the project will most certainly break up the community by breaking up existing walkways that neighborhood residents, especially in Chinatown, use to navigate the neighborhood. Chinatown is the community in LA with the second lowest AMI after Skid Row. It is also an aging community with a lot of elderly residents who will have specific challenges navigating their neighborhood and reaching essential resources during the construction phase and once the project is complete.

Response P676-6 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and how the proposed Project is consistent with General Plan policies related to environmental justice, including by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements, and by ensuring quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of how the proposed Project would not physically divide an established community and would therefore result in less than significant impacts for construction and no impacts for operation of the proposed Project. As discussed in Section 3.11, while construction of the proposed Project would require lane closures, such closures would be temporary and there would be a variety of options available for connections and access within the Project area. The surrounding communities will remain accessible from other surrounding streets and the closures would not physically divide these communities. Pedestrian access would be maintained through the provision of pedestrian detours

during certain phases of construction. Operation of the Project would not require permanent travel lane or sidewalk closures, and upon completion of construction activities, all existing travel lanes along the Project alignment would continue to provide access to surrounding communities. In addition, the required aerial easements for the proposed Project alignment would not physically divide an established community because the aerial easement would not impede vehicular and/or pedestrian circulation by virtue of its aerial nature. Additionally, the proposed Project would include a number of pedestrian enhancements and a mobility hub that would provide new multi-modal connection options. For instance, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements at this location could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Additionally, as discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment P676-7 Their needs have not been taken into account. Second, the project does not meet the General Plan of the LA State Historic Park. Trees would need to be cut down in order to build the project. In a City with constantly worsening air quality and increasing temperatures, trees are a vital resource that should be preserved and increased. *An exception to the General Plan should absolutely NOT be granted.*

Response P676-7 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles

State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment P676-8 *Noise Analysis*

The Draft EIR evaluated LTS for an average person, despite the fact that Chinatown has a growing elderly community with higher noise sensitivities. The age of the existing community should be taken into account when doing these analyses.

Response P676-8 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Report, of the Draft EIR, for discussion of the evaluation of noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. Noise standards, which are generally stated based on the use function of the property and not by age group, are nonetheless developed to protect sensitive populations, including seniors and children.

Comment P676-9 The Draft EIR also mentions a Noise Disturbance Coordinator. Who is this person? Will they be fluent in English, Spanish, Cantonese, Mandarin, and other languages spoken in the area? What powers will they have to address noise complaints? This does not seem to be a sufficient mitigation measure.

Response P676-9 As discussed in Section 3.13, Noise, of the Draft EIR, implementation of Mitigation Measure NOI-A during construction of the proposed Project would require the Project Sponsor to design a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include several measures to reduce noise levels, including a noise and vibration disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator would facilitate provision of Project information in multiple languages. The noise and vibration disturbance coordinator would determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable

measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent would be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions would be implemented, and a report of the action provided to the reporting party. In addition to the noise and vibration disturbance coordinator, Mitigation Measure NOI-A also provides for noise barriers, the proper maintenance of equipment, limitations on equipment idling, and other measures.

Comment P676-10 *Population and Housing Analysis*

The project claims that it will not cause any displacement, direct or indirect. However, the potential of the project to increase property values has not been assessed, which is one of the most significant driving factors of gentrification, which would lead to displacement as we have seen in dozens of neighborhoods throughout LA. The idea that this project will not cause any displacement is a false claim as we have seen time and time again.

Response P676-10 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision-makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.).

Comment P676-11 *Public Services*

The analysis claims that it will not add or alter any existing facilities. However, the Chinatown community has been deprived of services

Response P676-11 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing and is consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways,

and freeways, thereby reducing associated air pollution and improving safety. Refer to Section 3.15, Public Services, of the Draft EIR, for discussion of how the construction and operations of the proposed Project would result in less than significant impacts to public facilities including libraries, senior centers, homeless shelters, and daycare facilities.

Comment Letter P677 – Ron Frank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P677

Comment P677-1 there is SO MUCH that is wrong with this gondola project that it can't all be addressed here. (luckily, the vast volume of arguments _against_ it is 'out there' in the news and social media, so please consider all that too please!) suffice to say: IT'S A BAD IDEA. it's another chavez ravine-style community ravaging, but more subtle and really just way more stupid.

Response P677-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P677-2 beginning with la art's website's first page, there are nothing but lies, deceptions and misrepresentations..... all trying to distract the public with shiny new community 'benefits' that will only prove to put taxpayers on the hook for this shaky, ill-conceived, but very pretty, bait and switch scheme.

Response P677-2 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P677-3 the things it aims to do it can't and won't do: IT WILL NOT REDUCE TRAFFIC CONGESTION OR AIR POLLUTION. period! (there are other ways to get bodies up to the stadium and to reduce auto emissions... the already existing dodger express for example.)

Response P677-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between Los

Angeles Union Station (LAUS) and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P677-4 to take the project's objectives seriously is to be fooled into missing the point. this is actually a scam, a slight of hand operation that exists solely to benefit one man and his family. the shell game of entities under whose auspices the project is supposed to be completed by is shameful.

Response P677-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P677-5 there are very few large scale projects like this that ever come-in on-time or on-budget. first this was supposed to be 'privately' funded. then metro was somehow involved. now the project has been 'transferred' or 'donated', an orwellian move, just another subterfuge to convey the project to a seemingly beneficially-named organization. everyone knows that frank mccourt is only concerned with his personal financial interests - it's the height of irony having the project stewarded by something as seemingly innocuous as 'climate resolve'. the only climate mccourt wants to resolve is his financial climate.

Response P677-5 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With

the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment P677-6 and regarding the budget, there's no way this project will be fully funded by its proponents nor will it 'pay for itself'. so exactly what provisions are there to remedy any shortfalls in funding due to unforeseen issues in project construction and maintenance – BESIDES having the taxpayers rescue this boondoggle??

Response P677-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P677-5 regarding proposed Project costs and funding. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P677-7 the gondola project is really a huge impending problem in search of a solid quashing - before it's too late. this whole thing is a bus wreck you can see coming from miles away.

Response P677-7 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P677-8 once frank mccourt develops his half of the dodger stadium parking lot, there absolutely will be increased traffic and pollution not only in the construction of what is built there, but also from the patrons who will travel to and visit his new retail and restaurant complex. So if he's going to develop his part of the lot, why not just enhance the road capacity to the site and build parking structures there to handle the crowds.

Response P677-8 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P677-9 it's ironic how the conditions the project aims to ameliorate will only set in motion a compounding cascade of outcomes that will only make worse what it proposes to 'resolve'.

Response P677-9 Refer to Response P677-8 for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment P677-10 i'm not against building things. new is good! but this is the wrong thing in the wrong place for all the greatly wrong reasons.

Response P677-10 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P677-11 no matter how much the project tries to look pretty or do good for the area, the reality of the project will only bring blight and ruin to every point of its neighborhood contact. (in addition to scooters littering our streets, now there'll be big plastic buses flying over our neighborhood.

Response P677-11 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment P677-12 as well, i've not even addressed the irreparable destruction of wildlife habitat.

Response P677-12 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant.

Comment P677-13 as already mentioned, there is so much more to speak to in opposing this debacle in the making. thank you for STOPPING THE GONDOLA PROJECT, TODAY!

Response P677-13 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P678 – Annalee Harr

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P678

Comment P678-1 This project will not help traffic- this is a bold face lie to benefit the dodgers….

Response P678-1 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P678-2 We've heard about the expansion they want to do in Elysian Park for Dodger town… this will also be an amenity for all the development of sham TOCs in Chinatown——- what you are pitching are lies… it's disgusting…

Response P678-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P678-3 people will still drive just as people that live in TOCs have cars

Response P678-3 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment Letter P679 – Tabatha Yelos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P679

Comment P679-1 I am writing to express my opposition to the Dodger Stadium Gondola project. I have several concerns about the Draft EIR.

Response P679-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P679-2 through P679-19.

Comment P679-2 My first issue concerns AECOM, the company that prepared the Draft EIR. This company was selected and paid by Frank McCourt and LAART and thus, it is natural that the findings in the EIR would favor the interests of the developer. Every category was found to have "less than significant" impacts despite concerns from the community. I fear that the evaluations in the EIR contain a deep bias in favor of the developer. *Metro should work with the community to select an unbiased entity to conduct the EIR.*

Response P679-2 This is a duplicate of Comment P676-2. Refer to Response P676-2.

Comment P679-3 *Air Quality*

The Air Quality analysis found that the project would reduce VMTs and therefore decrease emissions. I find this hard to believe. As mentioned repeatedly by the community, the project would simply offset the VMTs to another location: either the station at Union Station or the station in Chinatown. People would still have to travel from all over Los Angeles to get to the gondola. The analysis does not account for first and last mile(s- in this case) traveled and therefore I fail to see how the overall emissions would be significantly reduced.

Response P679-3 This is a duplicate of Comment P676-3. Refer to Response P676-3.

Comment P679-4 *Energy Analysis*

Again, in this section the project claims to reduce VMTs without showing how exactly that will happen. The VMTs will simply be displaced to the gondola stations instead of reduced. Further, this analysis claims that the project will increase public transit ridership. This is a broad claim that seems to be based solely on the fact that people will ride the gondola to the stadium, but does not acknowledge that there is no first/last mile(s) solution included in the project and people will still need to drive to the gondola station in order to take it.

Response P679-4 This is a duplicate of Comment P676-4. Refer to Response P676-4.

Comment P679-5 *Greenhouse Gas Analysis*

This analysis claims that GHGs will be reduced because people will not be driving to Dodger Stadium. Again, the analysis fails to acknowledge that the project does not include a first/last mile(s) solution. A lot of Dodger fans live in the San Fernando Valley and in unincorporated East Los Angeles. How will these people get to and from the gondola? The GHGs will be offset, but I fail to see how they will be reduced.

Response P679-5 This is a duplicate of Comment P676-5. Refer to Response P676-5.

Comment P679-6 *Land Use and Planning Analysis*

Contrary to the analysis, the project will most certainly break up the community by breaking up existing walkways that neighborhood residents, especially in Chinatown, use to navigate the neighborhood. Chinatown is the community in LA with the second lowest AMI after Skid Row. It is also an aging community with a lot of elderly residents who will have specific challenges navigating their neighborhood and reaching essential resources during the construction phase and once the project is complete. Their needs have not been taken into account.

Response P679-6 This is a duplicate of Comment P676-6. Refer to Response P676-6.

Comment P679-7 Second, the project does not meet the General Plan of the LA State Historic Park. Trees would need to be cut down in order to build the project. In a City with constantly worsening air quality and increasing temperatures, trees are a vital resource that should be preserved and increased. *An exception to the General Plan should absolutely NOT be granted.*

Response P679-7 This is a duplicate of Comment P676-7. Refer to Response P676-7.

Comment P679-8 *Noise Analysis*

The Draft EIR evaluated LTS for an average person, despite the fact that Chinatown has a growing elderly community with higher noise sensitivities. The age of the existing community should be taken into account when doing these analyses.

Response P679-8 This is a duplicate of Comment P676-8. Refer to Response P676-8.

Comment P679-9 The Draft EIR also mentions a Noise Disturbance Coordinator. Who is this person? Will they be fluent in English, Spanish, Cantonese, Mandarin, and other languages spoken in the area? What powers will they have to address noise complaints? This does not seem to be a sufficient mitigation measure.

Response P679-9 This is a duplicate of Comment P676-9. Refer to Response P676-9.

Comment P679-10 *Population and Housing Analysis*

The project claims that it will not cause any displacement, direct or indirect. However, the potential of the project to increase property values has not been assessed, which

is one of the most significant driving factors of gentrification, which would lead to displacement as we have seen in dozens of neighborhoods throughout LA. The idea that this project will not cause any displacement is a false claim as we have seen time and time again.

Response P679-10 This is a duplicate of Comment P676-10. Refer to Response P676-10.

Comment P679-11 *Public Services*

The analysis claims that it will not add or alter any existing facilities. However, the Chinatown community has been deprived of services over the past couple of years. The public land used for this project should be used for public services that this community needs. Notably, more affordable housing to help abate the housing crisis city-wide and more healthcare services for the aging community in Chinatown.

Response P679-11 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing and is consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Section 3.15, Public Services, of the Draft EIR, for discussion of how the construction and operations of the proposed Project would result in less than significant impacts to public facilities including libraries, senior centers, homeless shelters, and daycare facilities.

Comment P679-12 *Transportation Analysis*

Again, I reiterate my claim that VMTs would be OFFSET, not reduced. The Draft EIR seems to rely on this A LOT as a condition of the project despite the fact that the analysis is lacking since there is not first/last mile(s) alternative. Futher, the project proposes a Traffic Management Plan.

Response P679-12 As discussed in Section 1.0, Introduction, of the Draft EIR, the lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each

year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. As discussed in Section 3.17 implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, would include street closure information, detour plans, haul routes, and a staging plan during construction to ensure that the impact is less than significant with mitigation incorporated.

Comment P679-13 As we have seen in past developments in the City, these plans are created without community input and radically impact the daily lives of community residents. This is not a sufficient mitigation measure for this community which has unique and diverse needs.

Response P679-13 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements, including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Details pertaining to the Construction Traffic Management Plan (CTMP) and Mitigation Measure TRA-B, are discussed on pages 3.17-67 through 3.17-69 of the Draft EIR. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP will prescribe for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P679-14 *Wildfire Analysis*

The project claims that it will not interfere with existing fire routes, but fails to consider that the LA infrestructure is falling apart and existing routes are already insufficient for community members. In Mt Washigton, a nearby hillside community, some of the fire routes are not even paved! A more in depth road quality analysis needs to be done here and fire routes need to be updated and a plan to improve these routes needs to be created with community input so that residents can safely evacuate in the event of a fire.

Response P679-14 Refer to Section 3.20, Wildfire, and Appendix P, Fire Hazard Assessment, of the Draft EIR, for an analysis of the proposed Project's potential wildfire impacts and a quantitative wildland fire hazard analysis, respectively. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. Refer to Appendix J, Reax Memo re Attorney General Guidance, for a discussion of how the Draft EIR complied with recent California Attorney General Guidance for analyzing wildfire risks under CEQA, including with respect to emergency access. Consistent with this guidance, the Draft EIR's analysis took into account that the proposed Project would primarily occur within an existing urbanized area, and provided an assessment of local fire history, site characteristics, and anticipated fire hazards. As discussed in Section 3.20, construction or operation of the proposed Project would not substantially impede adopted emergency response or emergency evacuation plans during an emergency spurred by a wildfire. The Draft EIR considered potential construction impacts to major interstates, highways, and primary arterials that could serve as evacuation routes within the proposed Project area, including Cesar E. Chavez Avenue, Alameda Street, Spring Street, North Broadway, and the SR-110. While construction of the proposed Project would require temporary road closures, evacuations in urban areas similar to the proposed Project typically are completed in discrete phases at the direction of local authorities and generally do not involve mass evacuations. Larger wildfires are actively tracked, allowing authorities hours or days to adjust evacuation strategies and to facilitate strategic evacuation of discrete areas. While road closures and roadway disruptions would be temporary and intermittent throughout construction of the proposed Project and would be in coordination with LADOT, emergency access would be maintained and construction activities would be quickly halted, as necessary, in the event of an emergency in coordination with LAFD and LAPD.

As discussed in Section 3.17, Transportation, a Construction Traffic Management Plan would be prepared as part of the proposed Project, which is included as Mitigation Measure TRA-B. The Construction Traffic Management Plan for the proposed Project would identify potential fire evacuation routes and construction equipment storage areas to ensure that equipment would not be stored within the roadways to allow for

emergency access, if needed. The Construction Traffic Management Plan would require coordination with the City and emergency service providers to ensure emergency access is provided to the proposed Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

Accordingly, the Draft EIR considered the proposed Project's potential evacuation impacts during construction and operation for area roads that could be used for evacuation or emergency access, concluding that the proposed Project would result in less than significant impacts. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact, such as the road quality analysis requested by this commentor. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment P679-15 *Project Alternatives*

The idea that the proposed project alternatives would not meet the goals of the proposed gondola project is absurd. Properly expanding the existing bus line to Dodger Stadium would do everything that the LAART project aims to do withouth disrupting the surrounding community.

Response P679-15 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P679-16 The goals of the project are broad and the claim that ONLY a gondola pr oject would meet these goals is unfounded - again, a product of a biased evaluation by a company that was handpicked by the developer.

Response P679-16 Refer to Response P679-2 for a discussion of how the Draft EIR reflects Metro's independent judgment and how AECOM was selected from Metro's roster of environmental consultants. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering

alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P679-17 *Parking Study*

The parking study evaluated parking spots withing 0.5mi of the project stations. 0.5mi is way too far of a range. Most people do not park that far away and then walk to a public transit hub. It would be far easier to take a rideshare to the stadium than walk 0.5mi to the gondola station. A better range would be 0.2mi. If we evaluate the parking in that range, I'm sure you will find that there is not neraly enough parking in the area.

Response P679-17 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which

is based on extensive data sources and assumptions validated by data, and pre-game and post-game transportation.

Comment P679-18 Also, the fact that this section acknowledges that parking will be necessary to the project directly contradicts the claim that the project will reduce VMTs - instead, it support the claim that VMTs will simply be offiset. There is certainly not enough parking around the project and not does the surrounding community want to be used as a giant parking lot. The community has urgent needs, like the need for more affordable housing and a nearby hospital, that need to be addressed. This project overlooks all of this in favor of parking spots - this is a offensive to the lives of community members.

Response P679-18 Refer to Response P679-12 for discussion of VTM reductions, and Response P679-17 for discussion of parking. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR, for details regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As detailed in Appendix N, based on existing data and conservative assumptions, the estimated non-vehicle mode of access (e.g. access by transit, walk, bike) is 67.5%. The main VMT reduction benefit of the proposed Project would come from travelers shifting from driving to Dodger Stadium to taking transit. The VMT change associated with some riders who park and ride rather than park at Dodger Stadium are factored into the analysis but are a minor in their effect given the proximity of the LAUS and Chinatown areas to Dodger Stadium. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P679-19 Commissioners, I remind you that you have a DUTY to protect the lives and interests of LA residents, and not of LA developers. You have a responsibility to help address the needs of the LA community, and not the desires of LA billionairs. This City is in a serious housing crisis - I'm sure I do not need to explain to you how bad the situation on the streets of this City is. We need to use PUBLIC LAND to address the urgent needs of our City and provide PUBLIC BENEFITS. Please, we are begging you, be responsible with you decisions and help our community that is in such dire need! Take a stand against this project that will bring so much harm and instead bring services that we so urgently need.

Response P679-19 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for

the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P680 – Valerie Albicker

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P680

Comment P680-1 My name is Valerie Albicker and I am a LAUSD teacher and lifelong Angelino community member. I want to express reasons for opposition to the Aerial Rapid Transit Project (Gondola at Dodger Stadium). As a resident of city council district #13 and who works with my students in Chinatown and neighboring communities, my students and families will be negatively impacted by this project.

Response P680-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P680-2 through P680-5.

Comment P680-2 The environmental damage and impact of the development, including obstructed views, will bring more light pollution to the surrounding homes and areas. Any lighting or towers will be a nuisance to homes and families.

Response P680-2 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.16, Public Services, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project lighting would include low-level lighting for security and wayfinding purposes. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including for lighting.

Comment P680-3 The impact of traffic also brings more air pollution into the dense area, further compounding the quality of health of community members that live in the area. Surrounding Chinatown and Union Station is the 101 and 5 FWY, the project will bring additional traffic into the area that affects pedestrians and residents of the area.

Response P680-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic

congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P680-4 With any development, families, such as my students living at the poverty level, are priced out and displaced as one of the consequences of gentrification.

Response P680-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P680-5 In addition to the environmental damage, traffic and displacement of the families I serve, there is the matter of financial transparency. There was no open public process or competitive bidding for this project. How is this project being funded and its ongoing maintenance? Communities, directly impacted by this plan, were not invited to voice whether or not this project is truly an improvement or value to its members!

Response P680-5 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project

Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P680-6 Thank you for taking the time to review my opposition and concerns for residents directly impacted. If you have any questions, please feel free to contact me at 310-869-5033.

Response P680-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P681 – Annalee Harr

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P681

Comment P681-1 Also earthquakes…….

Response P681-1 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including seismic activities, upon implementation of Mitigation Measures GEO-A.

Comment Letter P682 – Jasmine Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P682

Comment P682-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P682-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P683 – Peter Straus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P683

Comment P683-1 Keep me up to date on the proposed LA. Gondola System.

Thanks!

Response P683-1 This comment is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P684 – Rainey Chevako

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P684

Comment P684-1 Hello, I am an LA citizen who is writing to express my opposition to the proposed gondola to Dodger's stadium. I am concerned over the aesthetic and cultural damages it will inflict on my community and the lack of benefit it provides the people who actually live in this city.

Response P684-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on

the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P684-2 I also strongly oppose the potential cultural damage this will do to the city, as developments such as this may lead to future commercial development and gentrification in an area that has already been subject to much development.

Response P684-2 Refer to Response P684-1 for a discussion of the proposed Project's potential impacts to cultural resources. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Also refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. In addition, the proposed Project would provide an additional transit option for surrounding residents in Chinatown, and as discussed in Section 3.14, Population and Housing, of the Draft EIR, is not anticipated to substantially generate new development.

Comment P684-3 Furthermore, it provides no solution to the issue of traffic to and from Dodger Stadium.

Response P684-3 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets,

arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT.

Comment P684-4 This community is where I grew up and where I went to school. The people who live there should have *their *needs met, rather than having the needs of billionaire investors forced on them. Please reconsider this project.

Response P684-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment Letter P685 – Sandra Choi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P685

Comment P685-1 Hello,

I support the innovative and zero emission Gondola project, and I appreciate the goal of 35% which is unprecedented for local, small, diverse, and DVBE businesses.

This will help to create jobs and economic recovery for our community.

Response P685-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter P686 – Jose Mancera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P686

Comment P686-1 The Daily breeze provided this email for public comments on the proposed Gondola.

Request that there:

1

BE NO GONDOLA created over China Town. This project will not have much benefit to the citizens of Los Angeles. This design and rationale is only for the few moments in a month that it would be used, so essentially it will not be used much at all, you can say that this is a project of:

Response P686-1 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment P686-2 THE GONDOLA TO NO WHERE.

Mainly to be used during a day of games, it will therefore be

- costly and
- an unsightly hazard
- with many negative impacts to the China Town community

Response P686-2 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. The proposed Project would address a need for a permanent transit connection to one of the region's most visited venues, Dodger Stadium, and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans and represents an opportunity for additional visitors along the proposed Project alignment. Refer to Topical Response

L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project would have less than significant impacts related to aesthetics. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including, but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P686-3 2

There are many hazards associated with this concept that are swept under the rug and not included in a balanced perspective.

Response P686-3 Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials with implementation of Mitigation Measures HAZ-A and HAZ-B. Refer to Section 2.0, Project Description, of the Draft

EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Comment P686-4 2.1 There is constant danger of falling debris from the gondola to the ground. There is no garantes that it will be 100% enclosed and liquids and other items may be dropped.

Response P686-4 As discussed in Section 2.0, Project Description, of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins.

Comment P686-5 2.2 If it is enclosed, there is no air conditioned service to allow fresh comfortable air to be inhaled. Over time, people will trash and urinate (sorry, it is a reality) check the bus and tram lines now, and stink up the ride.

Response P686-5 Refer to Topical Response J, Gondola Design and Operations, for discussion of how gondola cabins can be removed for routine maintenance. Refer to Response P686-4 regarding the ventilation system. Further, cabins are anticipated to have transit-friendly surfaces that account both for durability and for ease of cleaning. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements.

Comment P686-6 2.3

The community of Chinatown will bear the stigma of other's poor stewardship.

Response P686-6 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment P686-7 2.4

There will be graffiti on the walls and windows and cut up fabric or switch blade carved out messages on the plastic seats.

Response P686-7 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. Refer to Responses P686-4 and P686-5 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-8 2.5

There is no plan to do several-times-a-day daily Corona virus sanitizing of each Gondola and associated equipment cleaning - like every 30 minutes. This would require a person on staff to ride with each trip and sterilize the cabin for each trip. Where is the requient to pay for these services? Where is the requirement to change scratched and graffitied windows and walls and seating each day that this occurs?

Response P686-8 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-9 2.6

Just look at the buses and bus stops and see for yourself that graffiti and vandalism will mirror the Gondolas without adequate cleaning. Did the MTA promos good stops? Why is this not so in many areas?

Response P686-9 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment P686-10 2.7

There is no requirement to have the gondola's windows cleaned every hour or so to keep them clean and shining as other countries would do. A terrible unsightly Gondala system will be evident in a few months time and yet this is to be hung over a community that has been mistreated across the generations, such a railroad workers in dangerous jobs

Response P686-10 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional

benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P686-11 2.8

Have you ridden the Amtrak train? I have. You will see massive graffiti and absolute filth along the tracks for a few miles out of Union Station, that is the true view of what they think of LA. this project will only contribute to that.

Response P686-11 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety. Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-12 2.9

Family and children and visitors will be at risk for dangerous cable failures of the gondolas.

Response P686-12 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P686-13 2.10

Why isn't there a similar plan over Beverly Hills? Over Marina Del Rey? Over La Canada? Only the poorer areas are giving the shaft.

Response P686-13 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities and the proposed Project's commitment to environmental justice. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit

connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P686-14 2.11

What is the percentage of the "person-hours metric" expected for the 95% of the time that there is no game? It is a waste of funds. This metric needs to be identified per hour basis over the visitar of six months with proper charts to easily show the time this is used by people.

Response P686-14 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Further, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[5] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and

[5] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P686-15 2.12

There should have been several options proposed to this "traffic congestion" problem for game times.

What are they?

When were they discussed?

Why weren't they provided?

Response P686-15 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA.

Comment P686-16 Why was this a sole-bid contract? Just because the company provided the initial plans, it should not go to them by default.

Response P686-16 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Nevertheless, this comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment P686-17 2.12

Better use of the funds for all of Los Angeles would be to extend one of the Fwy off ramps leading into the Griffith Park to get to the stadium, like the exit southbound on the 2 Fwy. I have driven by there for years commuting to JPL. These is heavy congestion and stress there in changing lanes every time.

Response P686-17 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic

Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P686-18 2.13

A better solution than the Gondola is to make all streets One Way towards the stadium at game time. All officers would prepare and direct traffic along each intersection for this to go smoothly.

Response P686-18 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The proposed alternative would fail to meet the basic project purpose and underlying project objectives of providing a sustainable form of transit to Dodger Stadium.

Comment P686-19 2.14

The poor decision to build the stadium where it is, is not for the people of Los Angeles to be expected to pay for their poor business decision. That organization already maltreated and expelled under malevolent intent, to remove poorer residents from their homes in Chavez Ravine to build this stadium, and now the injustices continue.

Response P686-19 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities Refer to Response P686-6 for discussion of the proposed Project's commitment to environmental justice. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine.

Comment P686-20 2.15

Bicyclist will not be able to be accommodated with their bikes on the Gondola. They would need many bike racks for locking their bikes. Even so, they risk their bikes being stolen during the game. It will take much real estate to adequately feed the Gondola Stations.

Response P686-20 The Draft EIR addressed bicycle facilities in Section 2.0, Project Description, and Section 3.17, Transportation, of the Draft EIR. As discussed on page 3.17-43, the proposed Project cabins would accommodate bicycles and could be used to further bicycle access for riders. While bicycle parking would not be provided at the Alameda Station next to LAUS, which has its own bicycle hub, the Chinatown/State Park Station is proposed to include a mobility hub, where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment P686-21 2.16

Additional car parking and motorcycle slots and e-bike slots are required way beyond what is already at union station, now not adequate at all. Have you parked there before? It is a stressful process. I have. You are just moving part of the congestion to this area, that is already not adequate for the citizens of LA, what new massive parking structures would you add - is it part of the proposal?

Response P686-21 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, would

be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P686-22 2.17

The additional noise of the Gondolas are an added sound hazard to the Chinatown's residents. This extra background noise has an expected decimal noise increase - what is that? Is the regular existing street noise already above safety standards? So will the new levels be on top of that?

Response P686-22 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. As demonstrated on Table 3.13-10, in Section 3.13, existing ambient noise levels in the vicinity of the proposed Project were measured based on Lday, Lnight, Ldn, and CNEL. Existing Lday ambient noise levels in the Project area range from 53.6 to 69.8 dBA and existing Lnight ambient noise levels in the Project area range from 48.7 to 65.5 dBA. As demonstrated on Tables 3.13-22, 3.13-23, 3.13-24, and 3.13-25 on pages 3.13-53 to 3.13-58 of Section 3.13, the operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, Federal Transit Administration (FTA) guidelines, and Los Angeles Municipal Code (LAMC). Specifically, as demonstrated on Table 3.13-23 based on the LAMC analysis the proposed Project would result in an increase in ambient noise levels ranging from 0.0 to 4.1 dBA (including both Leq(day) and Leq(night)). The increases are all below the the 5 dBA Leq LAMC threshold and no operational impact would occur under the worst-case scenario that assumed the highest line speed, cabins per hour, and queueing numbers, and nighttime operations. In addition, refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment P686-23 2.18

I would like to have the mayor and her staff and the developers move to continuously work, as mandatory, at this location to work in this hazardous new condition.

Response P686-23 Refer to Response P686-22 for a discussion of how the proposed Project would result in less than significant operational noise impacts. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials.

Comment P686-24 2.19

The bases/towers are to be requiring clean maintenance and it will be a big unpleasant footprint that will massively support this weight - three massive towers.

Response P686-24 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator.

Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. In addition, refer to Topical Response C, Project Features, discussing how the individual components of the proposed Project would be designed to weave seamlessly into the surrounding urban fabric. The proposed Project's design would take cues from the immediate neighborhood culture, and each component of the proposed Project, including Alameda Tower and Alpine Tower, would be designed to complement and reflect the unique character of the surrounding area.

Comment P686-25 2.20

What are the hours of operation? Will it be available 24/7? Has it been promised? What will happen when the developers want to cut back operating hours because it is not cost effective daily, only during the game

Response P686-25 As discussed in Section 2.0, Project Description, of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P686-26 2.21

Have the infrastructure to water fountains and restrooms access been included in this budget? Including maintenance to first-rate world-class maintenance and cleanliness?

Response P686-26 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the Park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P686-27 2.22

What are the traffic metrics now for traffic and gor “after project completion”? If they are way off after completion will it be shut down? A total folly.

Response P686-27 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project’s ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Response P686-21 for discussion of how traffic congestion is not required to be analyzed in the Draft EIR under CEQA.

Comment P686-28 Please seek out the full truth of the many negative consequences to China Town and the people of Los Angeles, as you work to understand all the pros and cons in this decision. I believe that the best decosion is to

CANCEL THE “GONDOLA TO NO WHERE FOLLY” PROPOSED PROJECT

Response P686-28 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project’s potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment Letter P687 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P687

Comment P687-1 Dear Mr. Zelmer,

I am OPPOSED to the LA ART Gondola Project.

Please include my comment letter and supporting document in the official file for the DEIR.

Sincerely,

Phyllis Ling

Response P687-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. All comments on the Draft EIR are included in Appendix C, Public Comments on the Draft EIR, and Appendix B, Public Hearing Transcripts, of the Final EIR. Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR. The comment letter referred to in this comment is Comment Letter P700. Refer to Responses P700-1 through P700-69.

Comment Letter P688 – Andy Sklawer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P688

Comment P688-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution.

Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,

Andy Sklawer

Response P688-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P689 – G. Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P689

Comment P689-1 To whom it may concern:

Regarding the LAART gondola proposal, it is my opinion that the proposed project be approved because it would provide a valuable transportation resource to those who want to patronize Dodger stadium and various surrounding places of interest.

By having gondolas ferrying people to various venues without the need to clear or otherwise physically harm, historic structures and/or areas, would provide a transportation option that is carbon neutral, would help to reduce traffic congestion and take advantage of unused air space.

Such a project may become a tourist attraction and be a great photography and social networking bonanza, which could infuse much needed and appreciated, money into the economy.

Response P689-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P689-2 Although cluttering Los Angeles's air space with support towers, cables and gondolas is a liability, unfortunately Los Angeles lacks much of a historical skyline or natural features that such things would harm anyway.

Ideally a vertical take-off and landing (VTOL) airport would be constructed at or near the historic train station and electric VTOL aircraft would ferry passengers to local destinations autonomously and on-demand; but until such a day comes to light, the gondolas would provide much benefit to Los Angeles's residents and visitors alike and as such, would be a refreshing asset to this great city.

Thank you.

Response P689-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including to scenic or panoramic views such as the downtown Los Angeles skyline.

Comment Letter P690

This comment number has intentionally been skipped.

Comment Letter P691

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Comment Letter P692

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Comment Letter P698

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Comment Letter P699

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Comment Letter P700 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P700

Comment P700-1

I. PROCEEDURAL DEFECTS IN THE DEIR REQUIRE ITS INVALIDATION AND RECIRCULATION

A. The DEIR Is Defective Due To Its Identifying The Wrong Lead Agency.

As shown in the Figure immediately above, the vast majority of the property affected by the Project is property under City or other governmental agency control, rather than Metro control. As detailed at DEIR pages 2-57 to 2-62, the preponderance of the discretionary approvals required for the Project are required from the City of Los Angeles. Per DEIR page 2-61, the following permits are required from Metro:

Los Angeles County Metropolitan Transportation Agency (Metro)

4. Approvals determined necessary by Metro for the Project, could include, but not necessarily be limited to, the following:

a. Pursuant to Public Utilities Code section 130252, submittal, review, and approval of proposed plans for design, construction, and implementation of the Project.

b. Pursuant to Public Utilities Code section 130521 and Civil Code section 801, an easement or other agreement or approval to authorize the construction and operation of the Project within a portion of Los Angeles Union Station.

c. Pursuant to Public Utilities Code section 130521, an encroachment permit or other agreement or approval to authorize construction and operation of the Project within any Metro L Line (Gold) right-of-way.

Response P700-1 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Metro is the proper lead agency for the proposed Project. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole." (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region's transportation system and is authorized to do "any and all things" to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with

consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project. As discussed in Topical Response D, Metro consulted with CEQA responsible agencies, including the City of Los Angeles. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process.

Comment P700-2 It should be noted that Public Utilities Code Section 130252 only relates to approval of a project description, and not detailed project plans, specifications, and estimates as noted in PUC Section 130252(c).[1] Which public agency will be responsible for approval of the detailed project plans, specifications and estimates for this private project and pursuant to what authority?

Footnote 1: https://law.justia.com/codes/california/2021/code-puc/division-12/chapter-4/article-3/section-130252/.

Response P700-2 This comment provides a general recitation and characterization of statutes, case law, and regulations. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project, consistent with its statutory authority under Public Utilities Code section 13052. Refer to Section 2.0, Project Description, for an overview of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project. Section 2.0 outlines the various agencies that could approve aspects of the proposed Project pursuant to their regulatory and statutory authority, including Caltrans, California State Parks, Cal/OSHA, Metro, and the City of Los Angeles.

Comment P700-3 Furthermore, it should be noted that PUC Section 130252(a) specifies that: "No such plan shall be approved unless it conforms to the appropriate adopted regional transportation plan pursuant to Chapter 2.5 (commencing with Section 65080) of Title 7 of the Government Code." A determination of conformance by the Southern California Association of Governments (SCAG), which prepares the Regional Transportation Plan (RTP), is thus needed before it can be assumed that Metro has plan approval power. Given that the Project is not included in the Federal Transportation Improvement Program[2] (FTIP) or the Transportation System Project List[3] used in developing the current Regional Transportation Plan/Sustainable Communities Strategy, RTP/SCS) it is questionable whether the Project is consistent with the RTP, and thus whether Metro is the appropriate Lead Agency. All of these issues should be resolved as part of public processes prior to proceeding with any DEIR process for the Project.

Footnote 2: https://scag.ca.gov/sites/main/files/file-attachments/21-05-lafinalcomparison.pdf?1624490178

Footnote 3: See: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_projectlist_0.pdf?1606000813

Response P700-3 This comment provides a general recitation and characterization of statutes, case law, and regulations. Refer to Section 1.0, Introduction, of the Draft EIR, pages 1-6 to 1-8, and Appendix N, Transportation Appendices, of the Draft EIR, for analysis of the proposed Project's consistency with each of the goals of the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), or "Connect SoCal." Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with the goals of Connect SoCal, as the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities, and would otherwise reduce greenhouse gas emissions by reducing VMT. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."

Comment P700-4 The following discretionary approvals are required from the City per DEIR page 2-61 to 2-62:

City of Los Angeles

5. Approvals determined necessary by the City for the Project, could include, but not necessarily be limited to, the following:

a. Pursuant to Charter section 390 and Los Angeles Administrative Code section 13.4, to the extent applicable, to be processed by the Department of Public Works, Bureau of Engineering and the Department of Transportation, a franchise agreement to operate "upon, over, under, or along any street, highway or other place in the City of Los Angeles."

b. Pursuant to Los Angeles Administrative Code section 22.109, to the extent applicable, approval of the design from the Cultural Affairs Commission for the Project components located within the public right-of-way.

c. Approvals, to the extent applicable, to be processed by the Department of City Planning, could include, but not necessarily be limited to, the following:

i. Pursuant to LAMC section 11.5.7 the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures.

ii. Pursuant to LAMC sections 13.11 and 12.32.S, a "SN" Sign District for a comprehensive set of sign regulations on the Project site to permit signage consistent with applicable City requirements.

iii. Pursuant to LAMC section 12.24.M, a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit ("CUP") to allow Stadium Tower and Dodger Stadium Station. CUP Condition 4 provides for collaboration "in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events."

iv. Relief from the River Implementation Overlay District, to allow for Alameda Station, Alameda Tower, and Alpine Tower.

v. Relief from the Cornfield Arroyo Seco Specific Plan to allow for Chinatown/State Park Station.

d. Pursuant to Government Code Sections 65864 through 65869.5, a Development Agreement between the Project Sponsor and the City of Los Angeles for 20 years.

Response P700-4 This comment provides a characterization of an excerpt as well as an excerpt from the Draft EIR. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P700-5 CEQA Guidelines Section 15051 establishes the criteria for identifying the lead agency, as follows:

15051. CRITERIA FOR IDENTIFYING THE LEAD AGENCY

Where two or more public agencies will be involved with a project, the determination of which agency will be the Lead Agency shall be governed by the following criteria:

(a) If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency.

(b) If the project is to be carried out by a nongovernmental person or entity, the Lead Agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.

(1) The Lead Agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution control district or a district which will provide a public service or public utility to the project.

> (2) Where a city prezones an area, the city will be the appropriate Lead Agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the prezoning. The Local Agency Formation Commission shall act as a Responsible Agency.
>
> (c) Where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the Lead Agency.
>
> (d) Where the provisions of subdivision (a), (b), and (c) leave two or more public agencies with a substantial claim to be the Lead Agency, the public agencies may by agreement designate an agency as the Lead Agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

It would appear that the City of Los Angeles has the greatest responsibility for supervising or approving the Project as a whole, and thus that Metro has improperly assumed the lead agency role.

Response P700-5 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project.

Comment P700-6 In addition, as detailed in this comment letter, the DEIR delegates responsibility for multiple mitigation measures to the City, yet only the City's Los Angeles Historical Monument Authority Department commented on the Notice of Preparation (NOP) for the Project. This is probably because the Notice of Preparation (NOP) failed to identify the important discretionary approvals required from agencies other than Metro.[4] Was the issue of the appropriate Lead Agency discussed with the City? Has an application for the Project been filed with the City?

Footnote 4: A copy of the NOP is available at: https://files.ceqanet.opr.ca.gov/264989-2/attachment/rT6WZKxmAw5CClASDTjN44ccsce8vIZo9I0VPcsZ2kSQAmO_aTD_KV1zEK1cpY0i6HAgSo12LpLfcDZ0

Response P700-6 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project and the City's participation in the environmental

review process as a CEQA responsible agency. As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro has primary responsibility for implementation of the proposed Project, and is the proper lead agency. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Public Resources Code section 21092(b)(1) specifies the requirements for what must be included in an NOP, including the date, time, and place of any public meetings or hearings on the proposed project; a brief description of the proposed project and its location; and the significant effects on the environment, if any, anticipated as a result of the project (Public Resources Code § 21092(b)(1); CEQA Guidelines § 15082(a)(1).) CEQA does not require the NOP to identify all discretionary approvals required for a project, nor could it, given the NOP is issued in the early stages of the environmental review process before all discretionary approvals required can be known. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of Metro's consultation with CEQA responsible agencies. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with the City and State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the City will conduct its own discretionary review process for the Project approvals it is responsible for.

Comment P700-7

B. The DEIR Is Further Defective In Failing to Identify and Consult with all Responsible and Trustee Agencies.

The DEIR is under-inclusive in identifying and consulting with all responsible and trustee agencies required under CEQA. As a result, the DEIR violates a core CEQA procedural mandate.

The DEIR identifies as "responsible agencies consulted" only certain City of Los Angeles departments, the City of Los Angeles El Pueblo Historical Monument Authority, and the California Department of Parks and Recreation. (DEIR pp. 8-4 & 8-5.) However, the DEIR lists several other agencies with approval authority over parts

of the Project. (DEIR pp. 2-57, 2-61 & 62.) All of these should have been named and consulted as responsible agencies.

As the DEIR acknowledges, permits and approvals will be required from several different agencies, including the California Department of Transportation (Caltrans), California State Parks, and Cal/OSHA. The City of Los Angeles has the most approval authority over the Project, and is the most logical lead agency for this and other reasons, including accountability by elected officials (the Los Angeles City Council) to the public, as opposed to the Metro Board, which is not elected. Because Metro has approval authority over some parts of the Project (DEIR p. 2-61), but far fewer in number than the City of Los Angeles. (DEIR pp. 2-61 & 2-62), Metro itself should be a responsible agency, not the lead agency.

Response P700-7 Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. Refer to Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from responsible agencies for the proposed Project. Refer to Response P700-6 for discussion of Metro's consultation with responsible agencies. Refer to Response P700-5 for discussion of how Metro is the proper lead agency for the proposed Project.

Comment P700-8 In addition, we believe other public agencies must be named as responsible agencies and consulted as CEQA requires. This includes the Public Utilities Commission (PUC). Because, inter alia, the Project would cross over and above railroad tracks, PUC review and approvals are required, with proper public notice and full public hearing processes provided. Also, the Santa Monica Mountains Conservancy is a responsible agency and/or trustee agency under CEQA. (Pub. Res. Code § 33105.) Similarly, the Housing and Community Development Dept. has approval authority as to part of the Project under the Surplus Land Act, which applies to some of the parcels and large street areas proposed for use as part of the Project.

All responsible agencies were required to be identified as responsible agencies and consulted early in the CEQA process. The under-inclusion/omission of responsible agencies, and the mis-attribution of lead agency role to Metro, creates an insurmountable flaw that renders the DEIR void ab initio.

Guidelines Section 15381 provides: "For the purposes of CEQA, the term 'responsible agency' includes all public agencies other than the lead agency which have discretionary approval power over the project."

Further, Pub. Res. Code § 21080.4(a) provides in pertinent part:

> "If a lead agency determines that an environmental impact report is required for a project, **the lead agency shall immediately send notice of that determination** by certified mail or an equivalent procedure **to each responsible agency** . . . . Upon receipt of the notice, **each responsible agency** . . . **shall specify to the lead agency the scope and content of the environmental information that is germane**

> **to the statutory responsibilities of that responsible agency** . . . in connection with the proposed project and which, pursuant to the requirements of this division, shall be included in the environmental impact report." Pub. Res. Code § 21080.4(a) (emphasis added).

See also Guidelines § 15096(b)(2): the responsible agency "shall specify the scope and content of the environmental information which would be germane to the responsible agency's statutory responsibilities in connection with the proposed project. The lead agency shall include this information in the EIR." Guidelines Section 15005(a) provides: "'Must' or 'shall' identifies a mandatory element which all public agencies are required to follow."

The DEIR's failure to name and specially serve and seek comment from all responsible (and trustee) agencies constitutes a procedural violation that independently renders the DEIR invalid. This failure has also caused Metro to violate CEQA's substantive requirements for full environmental disclosure by failing to obtain the expert views and comments of agencies with specialized knowledge of particular environmental and other issues and concerns.

"The purpose of allowing the public and other governmental agencies the opportunity to review EIRs include: sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals." Guidelines § 15200. Guidelines Section 15144 requires an agency to "use its best efforts to find out and disclose all it reasonably can" in preparing the EIR. Metro failed to comply with these mandates regarding soliciting the involvement and opinions of all expert responsible and trustee agencies.

This is an occasion where the lead agency not only must go back to the DEIR drawing board in terms of fixing and recirculating the DEIR, but where the correct lead agency needs to go to the drawing board in the first instance.

Response P700-8 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority, and Metro's consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the

responsible agencies to discuss the scope of environmental review, additional consultation with the City and State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. The Public Utilities Commission ("CPUC") is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. Santa Monica Mountains Conservancy ("SMMC") has no discretionary approval authority related to the proposed Project, however, Metro notified SMMC as a trustee agency.[6] CEQA defines a "trustee agency" as "a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California." (Public Resources Code, § 21070.) Refer to Topical Response E for a discussion of the Surplus Land Act. HCD is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. (Public Resources Code § 21069.) Section 2.10, Required Permits and Approvals, of the Draft EIR, provides a list of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project. As discussed in Appendix A, Public Outreach Report, of the Final EIR, consistent with the requirements of CEQA Guidelines section 15205(b)(2)-b(3), prior to the release of the Draft EIR, Metro submitted the required documentation of the release of the Draft EIR to the State Clearinghouse (SCH # 2020100007). Documentation of submittal of the Draft EIR to the State Clearinghouse is available on the SB 44 website.[7] As indicated on the Notice of Completion form submitted to the State Clearinghouse, the State Clearinghouse was responsible for distribution the Draft EIR to reviewing agencies. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-9 **C. The DEIR Is Further Defective Due To An Inadequate Notice of Preparation.**

CEQA Guidelines Section 15082(a)(1) requires in part that:

(1) The notice of preparation shall provide the responsible and trustee agencies, the Office of Planning and Research, and county clerk with **sufficient information** describing the project and the potential environmental effects **to enable the responsible agencies to make a meaningful response**. At a minimum, the information shall include:

(A) Description of the project

[6] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

[7] Refer to Remainder of the Record Category at https://laartsb44.net/#!/documents

The description of the Project in the NOP was similarly inadequate, as it failed to inform responsible agencies of the range of discretionary approvals over which they would be required to act. For example, it failed to inform the City of Los Angeles that it would be required to approve a new Specific Plan. The NOP thus failed to trigger comments by the City of Los Angeles regarding the requisite contents of the EIR, and whether Metro is the appropriate lead agency for Project environmental review. The NOP for the Project was therefore inadequate and ineffective.

Response P700-9 The proposed Project's NOP complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. The NOP fully complied with Section 15082(1)(a), and provided an adequate project description, the project location (including a map of the routes as well as a narrative description), and probable environmental effects. CEQA does not require an analysis of the probable environmental effects for the proposed Project in the Notice of Preparation, as that is the role of a Draft EIR. The NOP appropriately identified the environmental areas that would be studied in further detail in the Draft EIR. Further, sufficient information was provided in the NOP to guide the responsible agency consultation process, as the NOP provided a written project description detailing the components of the proposed aerial gondola system, the proposed route, project location and environmental setting, as well as the overall project purpose. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of the proposed Project's consultation with CEQA responsible agencies following the release of the NOP. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Section 2.10, Required Permits and Approvals, of the Draft EIR was developed, including the proposed Specific Plan in the list of discretionary entitlements, reviews, and approvals required for implementation of the proposed Project, in consultation with the City and other responsible agencies.

Comment P700-10 **D. The DEIR Is Further Defective Due To A Defective Notice of Availability.**

Pursuant to Guidelines Section 15097(c)(6), the Notice of Availability (NOA) for an EIR is required to disclose:

> (6) The presence of the site on any of the lists of sites enumerated under Section 65962.5 of the Government Code including, but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that Section.

The NOA for the proposed Project fails to indicate whether any of the sites associated with the proposed Project are listed in any of the Section 65962.5 databases, despite the fact that the Phase 1 Assessment for the Project, included in DEIR Appendix K, states on pages ES-3 to ES-5 that:

> The environmental database report search identified five properties in the proposed Project: LAUS and El Pueblo, which are the proposed locations for vertical circulation elements for the Alameda Station; 901 North Main Street, which is the proposed location of the Alpine Tower; the Los Angeles State Historic Park property, which is the proposed location of the Chinatown/State Park Station; and the 1201 North Broadway property, which is the proposed location of the Broadway Junction.
>
> LAUS (proposed location for construction support space and vertical circulation elements for the Alameda Station) was identified in multiple compliance-related databases, as well as the Cleanup Program Sites- Spills, Leaks, Investigations, and Cleanups (CPS-SLIC) database….
>
> El Pueblo (proposed location for construction support space and vertical circulation elements for the proposed Alameda Station), on the western side of Alameda Street, was identified in the US Brownfields database, which indicates that a Phase I ESA was completed in 2018 to 2019….
>
> The 901 North Main Street property (proposed location of the Alpine Tower) was identified in several compliance-related databases, as well as the United States (U.S.) Brownfields database, which is maintained by the U.S. Environmental Protection Agency (USEPA)….
>
> The EnviroStor database, which is an online data management system maintained by the California Department of Toxic Substances Control (DTSC), reports that Los Angeles State Historic Park (proposed location for the Chinatown/State Park Station) entered into a Voluntary Cleanup Program (VCP) with the DTSC in 2001, and remedial action (soil removal) was completed in 2003. However, according to a Supplemental Remedial Action Workplan Memorandum prepared by Group Delta Consultants, Inc. in 2015, during construction of Los Angeles State Historic Park in 2014, arsenic and lead contamination was encountered in near surface soils above the established site-specific clean-up goals. Based on available information on the online EnviroStor database, a complete soil removal action report has yet to be completed for the entire Los Angeles State Historic Park property; however, it appears from the Workplan Memorandum noted above that the soil removal action has been completed in selected portions of the park site….

Response P700-10 Under Public Resources Code section 21092(b)(1) and CEQA Guidelines section 15087(c),[8] agencies shall publish a Notice of Availability (NOA) that a draft EIR is available for public review. The NOA is to provide certain information, including the period during which comments on the draft EIR will be received and the manner in which the lead agency will receive comments; the date, time, and place of any scheduled public hearings or meetings to be held by the lead agency regarding the proposed project; a brief description of the proposed project and its location; the anticipated significant environmental effects of the project; the presence on the property of a hazardous waste site that is on any list specified under Government Code section 65962.5; a description of how the EIR can be provided in an electronic format; and the location where the draft EIR and documents incorporated by reference in the draft EIR are available for inspection. Public Resources Code section 21092(b)(2) further provides that "[t]his section shall not be construed in any manner that results in the invalidation of an action because of the alleged inadequacy of the notice content if there has been substantial compliance with the notice content requirements of this section." Thus, omission of certain information in an NOA is not a ground for invalidation of an action taken by the lead agency as long as the notice given substantially complies with the notice requirements. The NOA for the proposed Project substantially complied with the requirements of Public Resources Code section 21092 and CEQA Guidelines section 15087.

The NOA fully informed the public about the proposed Project. CEQA Guidelines section 15087(c)(6) requires that an NOA disclose the presence "of the site on any of the lists of sites enumerated under Section 65962.5 of the Government Code including, but not limited to lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that Section." The NOA included a URL link to the Draft EIR, which disclosed and analyzed potential impacts related to hazards and hazardous materials at the properties that coincide with the locations of the proposed Project's stations, towers, and junction, and proposed mitigation, in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR. As discussed therein, at page 3.9-29, the environmental database report (EDR) search conducted for the Phase I Environmental Site Assessment, included as Appendix K to the Draft EIR, identified five properties that coincide with the locations of the proposed Project's stations, towers, and junction. The presence of these properties on certain databases identified in an EDR search does not necessarily mean that they are on lists specified under Government Code section 65962.5.

None of the five properties are identified as being on (1) a list of hazardous waste and substances sites from the DTSC EnviroStor database, (2) a list of solid waste disposal

[8] The comment incorrectly refers to CEQA Guidelines Section 15097(c)(6). Section 15097 of the CEQA Guidelines relates to mitigation monitoring and reporting and does not contain any requirements for NOAs. The text cited in the comment is found in CEQA Guidelines 15087(c)(6).

sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit, (3) a list of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB, or (4) a list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code identified by DTSC.

As disclosed and analyzed in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, at page 6-17, the 1201 Broadway property was listed on the SWRCB's online Geotracker database as a "complete-closed LUST case . . ." As explained in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, at page 3.9-17, the LUST case associated with the property has been closed for over two decades and received a closure letter from the Los Angeles Fire Department in 2001. It is not included in any of the various "OPEN" status categories on the list of Leaking Underground Storage Tank Sites from the SWRCB Geotracker database.

Given this disclosure and analysis in the Draft EIR, and the fact that the list of Leaking Underground Storage Tank Sites from the SWRCB Geotracker database identifies the status of 1201 N. Broadway as "COMPLETED – CASE CLOSED," there is no prejudice. Section 3.09, Hazards and Hazardous Materials, and Appendix K, of the Draft EIR, disclosed the various database lists that the properties that coincide with the proposed Project's stations, towers, and junction were identified by the EDR to be included on, including lists compiled pursuant to Government Code section 65962.5 (along with other available databases). The Draft EIR evaluated any potential impacts associated with potential hazards and hazardous materials at these properties and proposed mitigation for the same.

Further, as identified on the State Clearinghouse Notice of Completion & Environmental Document Transmittal Form (SCH # 2020100007), the NOA of the Draft EIR was sent to DTSC and the Regional Water Quality Control Board # 4. Also, as discussed in Appendix A, Public Outreach Report, of the Final EIR, information related to potential hazardous material impacts at certain properties that coincide with the locations of the proposed Project's stations, towers, and junction, were presented to the public on slides 53 and 54 of the presentation of the key analyses and conclusions of the Draft EIR during the virtual informational workshop held on October 22, 2022, and the virtual public hearing held on December 13, 2022. This presentation was also printed and available to attendees of the three in-person public meetings held on October 25, 2022 (informational workshop), December 10, 2022 (public hearing), and January 12, 2023 (public hearing). During these in-person public meetings, a large, printed board summarizing the proposed Project's impacts analyzed in the Draft EIR identified that impacts from potential hazardous materials during construction of the

proposed Project would be less than significant with implementation of mitigation. These slides and boards are available on the proposed Project's SB 44 website.[9] [10]

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-11 Additionally, the Los Angeles State Historic Park property (proposed location for the Chinatown/State Park Station) is listed with an open-verification monitoring status in the CPS-SLIC database as of 2010. Based on review of documentation available on the online GeoTracker database, which is a data management system maintained by the State Water Resources Control Board (SWRCB), an annual groundwater monitoring program was first implemented in August 2000 at the request of the Los Angeles RWQCB….

Response P700-11 Refer to Response P700-10 for discussion of the substantial compliance of the NOA for the Draft EIR.

Comment P700-12 The 1201 North Broadway property (proposed location of the Broadway Junction) is listed with a completed-closed leaking UST (LUST) case as of 2001 in the environmental database report and the online GeoTracker database maintained by the SWRCB….

The NOA for the Project thus fails to comply with CEQA. The DEIR must be re-noticed and recirculated for public review and comment.

Response P700-12 Refer to Response P700-10 for discussion of the 1201 North Broadway property and the substantial compliance of the NOA for the Draft EIR. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-13 **E. The DEIR Is Further Defective By Failing to Obtain Responsible Agencies' Acceptance of Delegation of Mitigation Responsibility.**

There are a number of mitigation measures specified in the DEIR which are not within the Lead Agency's control, including MM-LUP-A, MM-TRA-A, MM-TRA-B, MM-TRA-C, and MM-USS-A, as detailed more fully later in this comment letter. Guidelines Section 15097 permits delegation of mitigation monitoring responsibility, provided that the public agency that would be responsible accepts delegation, stating:

15097. MITIGATION MONITORING OR REPORTING.

(a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR or adopted a mitigated negative declaration in conjunction with approving a project. In order to ensure that the mitigation measures and project revisions

[9] Los Angeles Aerial Rapid Transit. 2022. LA ART Informational Workshop Slides – 10/22 (available in English, Spanish, Chinese-Simplified, Chinese-Traditional).

[10] Los Angeles Aerial Rapid Transit. 2022. Draft EIR Informational Workshop Boards (All Languages).

> identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program. (Emphasis added).

There has been no demonstration or documentation provided that the responsible agencies in question both concur with these mitigation measures and that they have accepted the delegation. Logically, documentation of acceptance of delegation necessarily needs to be provided as part of the DEIR, otherwise there is a lack of substantial evidence that the mitigations in question are feasible, and commenters cannot rely on the Lead Agency's representation that the mitigation measures would reduce impacts to a level considered less than significant. Since no such documentation is provided as part of the DEIR, the Lead Agency has therefore failed to proceed in the manner required by law.

In the absence of substantial evidence of responsible agency agreement and concurrence with the delegated mitigation measures, the potential for impacts in the areas of land use and planning (LUP), transportation (TRA), utilities and service systems (USS) and any other issue areas that depend on the delegation of mitigation development, implementation or monitoring to a public agency other than the Lead Agency, remain. Including pursuant to Guidelines Section 15088.5(a)(1) and (4), the DEIR must be corrected and recirculated for public review and comment.

Response P700-13 Refer to Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR for an overview of mitigation monitoring requirements and for the proposed Project's Mitigation Monitoring and Reporting Program. The proposed Project's Mitigation Monitoring and Reporting Program satisfies the requirements outlined under CEQA Guidelines section 15097. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Therefore, it follows that the EIR need not provide evidence of whether an agency has "accepted" the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Further, Metro consulted

with the City and State Parks pursuant to their roles as responsible agencies during the preparation of the MMRP. Accordingly, no corrections to the Draft EIR are warranted and this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-14

II. SUBSTANTIVE DEFECTS IN THE DEIR REQUIRE ITS INVALIDATION AND RECIRCULATION, INCLUDING THE DEIR'S LACK OF AN ACCURATE, STABLE AND FINITE PROJECT DESCRIPTION.

As first noted by the Courts in County of Inyo v. Los Angeles (1977) 71 Cal.App.3d 185, 199, and reiterated in many subsequent cases, "(a)n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." As explained by the Court of Appeal in StopTheMillenniumHollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1:

> County of Inyo was the first decision to articulate the need for a definite and unambiguous project description as part of CEQA's environmental review process…
>
> The County of Inyo court… concluded that the "incessant shifts' among different project descriptions "vitiated[d] the City's EIR process as a vehicle for "intelligent public participation," because "[a] curtailed, enigmatic or unstable project description draws a red herring across the path of public input."….
>
> "The requirement of an accurate, stable, and finite project description as the sine qua non of an informative and legally sufficient EIR has been reiterated in a number of cases since County of Inyo. (See, e.g., Treasure Island, supra, 227 Cal.App.4th at p. 1052, 174 Cal.Rptr.3d 363 ["This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading"]; Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 85–89, 108 Cal.Rptr.3d 478 [EIR failed as an informal document because the project description was inconsistent and obscure as to the true purpose and scope of the project]; San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 653, 57 Cal.Rptr.3d 663 [an EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project].)"
>
> "'Only through an accurate view of the project may affected outsiders and public decision makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal…. and weigh other alternatives in the balance.' [Citation.]" Id. at 16-19.

A. The NOP Failed to Provide a Stable Project Description.

> The NOP for the Project failed to provide an accurate and stable project description, indicating that:
>
> > The proposed route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium. The **proposed Project includes options** for an intermediate station to provide additional transit service adjacent to the Los Angeles State Historic Park and the location where the proposed Project flies over portions of the Park (the Spring Street Alternative and Broadway Alternative). . . . Figure 1 shows the regional location of the proposed Project and Figures 2 and 3 provide an overview of the Spring Street Alternative and Broadway Alternative, respectively. (Emphasis added).

Response P700-14 Refer to Response P700-9 for discussion of how the NOP for the proposed Project complied with CEQA. Refer to Responses P700-15 through P700-18 for discussion of how the Project Description for the proposed Project in the Draft EIR complied with CEQA. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-15 **B. The DEIR Fails to Provide a Stable Project Description.**

The lack of an accurate, stable and finite project description is then carried forward into the DEIR. DEIR page ES-10 indicates that:

> The Project Sponsor will request consideration by the Los Angeles Dodgers **of the potential** for the Dodger Stadium Station **to include** a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Issues to be addressed in connection with such consideration as to the mobility hub include maintaining security for Dodger Stadium and the surrounding surface parking areas. (Emphasis added).

How has the potential for the Project to include this mobility hub been addressed in the DEIR? An EIR is required to contain an accurate, stable and finite project description. This shows that there is fluidity in the project description and that the project description is not fully accurate or stable.

Response P700-15 Pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. Section 2.0, Project Description, of the Draft EIR, included a description of all integral components of the proposed Project for the environmental analysis, enabling Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, to fully analyze and disclose all impacts of

the proposed Project, and Section 4.0, Alternatives, of the Draft EIR, to consider potential alternatives to the proposed Project. Section 2.0, Project Description, of the Draft EIR contains the specific descriptions of the proposed Project required pursuant to CEQA Guidelines Section 15124, including a description of the proposed Project's location (Draft EIR, § 2.3), a statement of the project objectives (*id*., § 2.3.8), a description of the project's technical and environmental characteristics (*id*., §§ 2.2, 2.4 to 2.9), a discussion of the intended uses of the EIR (*id*., § 1.2), and a list of the project approvals that will be required (*id*., § 2.10). The Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The mobility hub at Dodger Stadium Station was included in Section 2.0, Project Description, of the Draft EIR and therefore assumed in the Draft EIR's analysis. For example, in Section 3.17, Transportation, of the Draft EIR, the mobility hub at Dodger Stadium Station was considered in the formulation of ridership estimates for neighborhood riders.

Comment P700-16 This fluidity is further exhibited in both the Executive Summary and DEIR Chapter 6, which describe five Design and Use Options for the Project. As explained on DEIR page 6-1:

> While not proposed as part of the proposed Project, design and use options to the proposed Project have been considered in this Draft EIR to explore potential options to various Project components. Each design and use option offers a variation to the proposed Project.
>
> Pursuant to Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives. This Draft EIR provides that analysis in Chapter 4.0. This Chapter 6.0 considers minor variations to the proposed Project, which qualify as design and use options instead of project alternatives.
>
> For the proposed Project, five design and use options are considered for analysis in this chapter:
>
> - Design Option A: Broadway Junction Shift to Avoid 451 E. Savoy
> - Design Option B: Single Tower along Alameda Street
> - Design Option C: Chinatown/State Park Station with Increased Height
> - Use Option D: Chinatown/State Park Station as a Non-passenger Junction
> - Design and Use Option E: Pedestrian Bridge at the Los Angeles State Historic Park

> The five design and use options are described below, along with an analysis of their potential environmental impacts. The impact analysis is performed relative to the respective Project component of the proposed Project.

It therefore is obvious that the DEIR includes a menu of possible Project components, rather than an accurate and stable project description, and that the project description thus fails to include the Project's precise location and boundaries. This is a fatal flaw of the DEIR. As noted by the Court in Save our Capitol v. Department of General Services (Dec. 6, 2022) 85 Cal.App.5th 1101 (Save our Capitol):

> The description **must include the project's precise location and boundaries**; a statement of the project's objectives and underlying purpose; a general description of the project's technical, economic, and environmental characteristics; and a statement describing the EIR's intended use. (Guidelines, § 15124, subds. (a)-(d).) Whether the EIR contains an accurate and stable project description is a question of law subject to de novo review. (South of Market Community Action Network v. City and County of San Francisco (2019) 33 Cal.App.5th 321, 332, 245 Cal.Rptr.3d 174 (South of Market); accord Tiburon Open Space Committee v. County of Marin (2022) 78 Cal.App.5th 700, 738, 294 Cal.Rptr.3d 56.)
>
> An accurate and complete project description is necessary for an intelligent evaluation of a project's potential environmental impacts. (Center for Sierra Nevada Conservation v. County of El Dorado (2012) 202 Cal.App.4th 1156, 1171, 136 Cal.Rptr.3d 351; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 730, 32 Cal.Rptr.2d 704.) It must contain sufficient information to understand the project's environmental impacts. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 28, 82 Cal.Rptr.2d 398.) "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal ... and weigh other alternatives in the balance." (County of Inyo, supra, 71 Cal.App.3d at pp. 192-193, 139 Cal.Rptr. 396.) . . .
>
> For us, the governing principal is whether the project description may have thwarted the public's ability to participate in the process and comment meaningfully on the EIR. Inadequate or unstable descriptions of the project may mislead the public and thwart the EIR process. (San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 656, 57 Cal.Rptr.3d 663.) "**A project description that gives conflicting signals to decision makers and the public about the nature of the project is fundamentally inadequate and misleading**." (South of Market, supra, 33 Cal.App.5th at p. 332, 245 Cal.Rptr.3d 174.) "A curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (County of Inyo, supra, 71 Cal.App.3d at p. 198, 139 Cal.Rptr. 396.) . . . . (Emphasis added.)

The inclusion of separate, segmented environmental review, of a menu of potential design component options, confuses and misleads the public regarding both the project description and the environmental impacts of the Project. In addition, the differing design options may result in different impacts to treasured historical resources, particularly when it comes to aesthetic impacts on these resources. (See discussion later in this letter documenting the Project's significant aesthetic impacts on historic resources). Thus, the fluid project description, plus introduction of Design Options, renders the project description fatally flawed.

Response P700-16 This comment provides a general recitation and characterization of the Draft EIR and CEQA statute, case law, and regulations. Refer to Response P700-67 for discussion of the use of Design and Use Options in the Draft EIR and how they do not render the Project Description unstable.

Comment P700-17 **C. The DEIR Is Further Defective Because the Project Description Omits Integral Components of the Project.**

The project description included in the DEIR is also fatally flawed because it is incomplete and omits any detail regarding integral components of the Project. As noted on DEIR pages 2-61 to 2-62, the Project requires:

- An amendment to the Los Angeles State Historic Park General Plan
- A franchise agreement from the City of Los Angeles
- Creation and approval of a Specific Plan from the City of Los Angeles
- Modifications or relief from the City's River Implementation Overlay District and Cornfield Arroyo Seco Specific Plan

The DEIR fails to provide specific information regarding the contents of the newly required Specific Plan, or the modifications to existing Plans and Overlay Districts. As a result, the Project Description is curtailed, incomplete and thus not accurate. As noted by the Court in Save Our Capitol at p. 130: "A project description that omits integral components of the project may result in an EIR that does not adequately disclose all the project's impacts."

The proposed General Plan amendment, franchise agreement, Specific Plan, and modifications or proposed relief documents should all be provided to the public concurrently with recirculation of a new DEIR.

Response P700-17 Refer to Topical Response F, Los Angeles State Historic Park Considerations for a discussion of the State Historic Park General Plan Amendment. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro engaged in consultation with responsible agencies (i.e., those tasked with the approval of the agreements and entitlements listed in the comment) early in the CEQA process and continues such consultation. Further, the discretionary and/or ministerial approvals presented in

Section 2.0, Project Description of the Draft EIR were determined to be necessary by the relevant responsible agencies. These were determined based on the description of the proposed Project as provided within the Project Description, which includes, but is not limited to, the location of the proposed Project, and the technical, economic, and environmental characteristics, consistent with the requirements of CEQA Guidelines section 15124, as discussed in Response P700-15. The Project Description provides a complete picture of the proposed developments and does not omit any integral components of the proposed Project. CEQA does not require inclusion of the documents requested in the comments, which will be provided to the public in connection with their consideration before the appropriate responsible agency following the potential certification of the EIR. Citation to the specific requirements and approvals is sufficient for the EIR to function as an informational document. Accordingly, this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-18 In addition, the Project Description fails to specify the days and hours of Project operation. This along with the omission of anticipated fare information makes an independent confirmation of the accuracy of DEIR representations regarding ridership and VMT reductions impossible.

The Project Description in the DEIR is thus fatally flawed. Including pursuant to Guidelines Section 15088.5(a)(4), the DEIR must be corrected and recirculated for public review and comment.

Response P700-18 The Draft EIR addressed hours of operation in Section 2.0, Project Description. Page 2-42 in Section 2.0, Project Description, of the Draft EIR, states that it is anticipated that the proposed Project would typically provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. Refer to Topical Response C, Project Features, for a discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR and Section 5.0, Corrections and Additions, of the Final EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel

time and cost to Dodger Stadium and LAUS for driving and transit (including that the proposed Project would be free to ride for anyone with a ticket to a Dodgers game), parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data sources. Refer to Response P700-17 for a discussion of the Project Description's compliance with CEQA. The Project Description in the Draft EIR includes 62 pages of detailed descriptions of the whole of the action considered as part of the Project. In turn, the Draft EIR fully analyzes and discloses the potential environmental impacts of this proposed Project, providing mitigation as necessary for potentially significant impacts. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P700-19 **D. The DEIR Is Further Defective Because The Project Description Fails to Provide Evidence That the Project is Financially Feasible in the Long Term or Information on the Fare Structure.**

Few public transit systems are fully funded by project fares. This is a private transit project. It is therefore important that the DEIR provide full disclosure regarding Project construction and operating costs, and the anticipated fare structure to demonstrate that the Project and the alternatives are feasible as proposed. This is important for a number of reasons that have implications for the environmental analysis.

For example, first, if the Project does not prove to be financially viable, and the system has to be abandoned or publicly subsidized, it could result in physical degradation of the area, or the diversion of financial resources that support the existing public transit system in order to maintain the Project, thus impacting existing public transit operations. The potential for such economic impacts to result in physical impacts on the environment needs be addressed in the DEIR, including pursuant to Guidelines Section 15131(b), particularly given that it does not appear that there is a financing plan in place which would provide for adequate operational revenues to support this private transit Project long-term.[5]

Second, the fare structure will have an impact on ridership and the mode choice of potential users. The DEIR claims that the Project will result in a reduction in VMT, but both ridership and resulting changes in VMT are highly dependent of the cost of the fare, particularly when it comes to a transit project such as this one, which will largely serve non-transit dependent discretionary riders making non-commute trips.[6] Therefore, information regarding operating costs, responsibility, financing, and

anticipated fares is needed to support any claims regarding Project-related VMT reductions. In the absence of such information, any claims of VMT reduction, and consequent GHG reductions, are not supported by substantial evidence. This also means that any claims that the Project is consistent with the RTP are also not supported by substantial evidence.

Footnote 5: According to the Los Angeles Business Journal, September 5, 2022: https://labusinessjournal.com/engineering/dodger-stadium-gondola-project-developer-hands-offproject-to-environmental-group-partner-retains-funding-role/

Los Angeles Aerial Rapid Transit, the gondola tram development company headed by former Los Angeles Dodgers owner Frank McCourt, agreed on Aug. 9 to donate the gondola project to downtown-based Climate Resolve, an environmental nonprofit that focuses on collaborations to fight the impacts of climate change.

Under the deal, Los Angeles Aerial Rapid Transit will continue to fund the entitlement phase of the project, but Climate Resolve – through a newly created subsidiary called Zero Emissions Transit – will be responsible for shepherding the project through the entitlement process and then assembling the funding package and managing the construction phase.

According to the FAQ for the Project at https://www.laart.la/faq/

> Similar to the Dodger Stadium Express, each baseball fan with a ticket to a Dodger game will be able to ride the gondola for free to the game..... Recognizing that they are not responsible for the project's financing, the Dodgers will join in providing information about this sustainable and clean energy transit opportunity, so it is well understood by Dodger fans..... Just like the Dodger Stadium Express, the aerial gondola will be free to ride for anyone attending a game at Dodger Stadium, which will maximize the air quality benefits from the project and encourage transit ridership.... Additionally, to increase local mobility options, the proposed "Community Access Plan" would allow local residents and employees of businesses close to the project to ride the gondola using their Metro fare at no additional cost.... For other riders, including tourists, a separate fare is being evaluated, to ensure that LA ART helps to attract visitors to learn more about the history of Los Angeles, starting at Union Station, and enjoy shopping and dining opportunities as well as cultural attractions at Olvera Street and Chinatown.
>
> It therefore does not appear that there is a financing plan in place which would provide for adequate operational revenues to support the system long-term.

Footnote 6: As noted in Transit Price Elasticities and Cross-Elasticities, 16 September 2022, Todd Litman, Victoria Transportation Policy Institute, available at: https://www.vtpi.org/tranelas.pdf Transit Price Elasticities (i.e., the degree to which transit ridership is affected by changes in price) are a function of:

- User Type. Transit dependent riders are generally less price sensitive than choice or discretionary riders (people who have the option of using an automobile for that trip).
- Trip Type. Non-commute trips tend to be more price sensitive than commute trips. Elasticities for off-peak transit travel are typically 1.5-2 times higher than peak period elasticities, because peak-period travel largely consists of commute trips.
- Type of Price Change. Transit fares, service quality (service speed, frequency, coverage and comfort) and parking pricing tend to have the greatest impact on transit ridership. Elasticities appear to increase somewhat as fare levels increase (i.e., when the starting point of a fare increase is relatively high).
- Direction of Price Change. Transportation demand models often apply the same elasticity value to both price increases and reductions, but there is evidence that some changes are non-symmetric. Fare increases tend to cause a greater reduction in ridership than the same size fare reduction will increase ridership. A price increase or transit strike that induces households to purchase an automobile may be somewhat irreversible, since once people become accustomed to driving they often continue. See also: https://digitalcommons.usf.edu/cgi/viewcontent.cgi?article=1339&context=jpt

"Transit fares have a negative and significant effect on ridership in Los Angeles." Per Rui Liu. "Improving Demand Modeling in California's Rail Transit System" Mineta Transportation Institute Publications (2018). Available at: https://scholarworks.sjsu.edu/cgi/viewcontent.cgi?article=1238&context=mti_publications

Response P700-19 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, and Response P700-47 for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR and Section 5.0, Corrections and Additions, of the Final EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit (including that the proposed Project would be free to ride for anyone with a ticket to a Dodgers game),

parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data sources. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[11] Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also typically provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P700-20

III. THE DEIR ALSO VIOLATES CEQA BECAUSE IT FAILES TO ANALYZE THE "WHOLE" OF THE PROJECT, AND ENGAGES IN, AND TURNS A BLIND EYE TO, ILLEGAL PIECEMEALING.

A significant portion of the block located east of Bishops Road, north of North Broadway, and south and west of Savoy Street has been acquired at far above market rates between approximately 2019 and 2022. (**Exhibit** attached hereto [parcel maps, data].) This heretofore undisclosed assemblage of parcels in the direct path of and within the Project area appears to be a piecemealed portion of the whole of the larger Project, which the DEIR fails to disclose to the public and decision makers. One must ask why, it appears, McCourt- or LA AART-affiliated entities spent tens of millions of dollars in 2019, and continuing in 2022, at that block. A major parking garage or high-

[11] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

density development seem to be likely candidates for that assemblage. (See https://planning.lacity.org/pdiscaseinfo/search/encoded/MjEwNjk00 and https://la.curbed.com/2017/8/10/16126038/johnson-fain-chinatownheadquarters-for-sale). The true plan for Bishops/Broadway has not been revealed, but must be as part of a recirculated DEIR.

This large McCourt-directed development clearly appear linked to the Gondola Project but has not been disclosed, analyzed and mitigated in the current DEIR. As a result, the DEIR violates CEQA's prohibition against piecemealing. It does not account for the whole of the Project, including its significant cumulative and growth inducing impacts.

Response P700-20 The exhibit was considered in connection to this response. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system.. As discussed in Section 2.0, Project Description, of the Draft EIR, 1201 North Broadway is location of the proposed Project's Broadway Junction, a non-passenger junction. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for an analysis of the proposed Project's cumulative and potential growth inducing impacts. Pursuant to Section 15130(b)(1)(A) of the CEQA Guidelines, a list of past, present, and probable future projects producing related or cumulative impacts was used as the basis for the Draft EIR's cumulative impacts analysis. As shown on Table 5-1, Related Projects, a mixed-use redevelopment project at 1201 North Broadway, i.e., the location cited in the comments as a potential development site, was analyzed as a related project for the Draft EIR's cumulative impacts analysis. The 1201 North Broadway project included as a related project had been entitled when the property was purchased. That entitled project was included and analyzed as a related project in the Draft EIR. All approved and proposed related projects relevant to the cumulative analysis for the proposed Project were included in Table 5-1. The proposed Project does not include other development beyond what is analyzed in the Draft EIR; neither the Project Sponsor nor anyone else has applied for other development unrelated to the proposed aerial gondola project on the North Broadway/Savoy Street block, and the proposed Project was not improperly segmented or "piecemealed" from a larger development project .

Comment P700-21 **IV. ADDITIONAL CONCERNS ARE RAISED BY THE DEIR'S EXECUTIVE SUMMARY.**

What is the nature of the relationship between the Project Sponsor and the owners and operators of Dodger Stadium? Is this Project, in fact, being proposed by the owners and/or operators of Dodger Stadium, or some subset thereof?

Response P700-21 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero

Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P700-22 The DEIR indicates that the gondola system will require a total of approximately 2.5 megawatts of power (see for example DEIR page ES-12). What is the unit of time for this power use, per minute, per hour, per day, per week?

The DEIR describes the Project as a "high-capacity" zero emission ART. In what way is this a zero emission Project? The Project will require electrical consumption. Electrical generation results in emissions. In what way is this Project high-capacity? The description does not appear to be accurate.

Response P700-22 As discussed in Section 3.06, Energy, and Section 5.1.3.2 of Appendix H, Energy Technical Report, of the Draft EIR, when operating near capacity, normal operations are estimated to require approximately 2.5 MW of power which may occur during peak and non-peak periods. As discussed in Section 3.06, once fully operational (2026), the proposed Project would result in electricity demand of approximately 6.9 GWh/year. Further, the electrical power for the proposed Project's operations of the aerial gondola system and associated stations, junction, and towers, would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions , in this Final EIR. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources. As discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, 3S technology enables larger passenger cabins, and thus, more carrying capacity than other available aerial gondola technology. The 3S cabins typically carry between 30 to 40 passengers each. During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction.

Comment P700-23 According to Table ES-1, the Project will require the export of a total of 62,623 cubic yards of soil. Table ES-1 should include a line summing the figures provided in the table. The DEIR needs to identify the disposal site for the exported soil and address any indirect impacts associated with the soil export.

Response P700-23 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, in the Draft EIR for the amounts of materials to be exported for proposed Project construction. An EIR need not identify the exact location of the haul route because those details are frequently determined during construction based on actual excavated soil conditions, which cannot be known at the time of the EIR preparation.

Nevertheless, refer to Response GO17-189 for a discussion of certain identified landfills and how the Draft EIR analyzed air quality impacts, including those related to emissions from haul truck trips during construction in accordance with applicable SCAQMD guidance. Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for discussion of how the emissions from haul truck trips would result in a less than significant impact.

Comment P700-24 **V. THE DEIR ALSO VIOLATES CEQA THROUGH IMPROPER USE OF PROJECT DESIGN FEATURES (PDFS) AND BEST MANAGEMENT PRACTICES (BMPS).**

DEIR page ES-21 states:

> Project Design Features (PDFs), while not necessary for the impact significance determination, are included in Table ES-2 because they are inherent in the design of the proposed Project. Best Management Practices, or other measures required by law and/or permit approvals, are also requirements of the proposed Project.

However, some of the PDF's are clearly mitigation measures and the DEIR fails to innumerate the BMPs assumed in the impact analysis, identify what agency has identified them as BMPs, and to demonstrate that they are really features of the Project, rather than mitigation.

In terms of the PDFs, CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CULPDF-D and CUL-PDF-E, for example, are clearly designed to address potential impacts to the El Grito mural and historic Winery and do not describe physical components of the Project. The fact that these PDFs are mitigation measures is evidenced by statements in DEIR Appendix G, including the following:

> **Los Angeles Plaza Historic District and The Winery[7]**
>
> The Winery is listed as a contributor to the National Register Los Angeles Plaza Historic District and Los Angeles HCM. The Project may cause direct impacts to The Winery, and thus the Los Angeles Plaza Historic District. Detailed mitigation measures to minimize vibratory impacts to The Winery caused by construction activities to less than significant, including the use of vibration monitoring equipment (VIB-A) and force adjustable ground compaction devices (VIB-B), are provided in LA ART Noise and Vibration Technical Report. In addition to VIB-A and VIB-B, **GPA recommends the implementation of the following PDFs to ensure unforeseen impacts can be minimized to a less than significant level**…
>
> **El Grito (The Cry) Mural[8]**
>
> The Project may cause direct impacts to El Grito mural within Placita de Dolores. The mural is eligible for listing in the National Register, California Register, and as a Los Angeles HCM. Detailed mitigation measures to minimize vibratory impacts to El Grito caused by construction activities to less than significant, including the use of vibration monitoring equipment (VIB-A) and force adjustable ground

compaction devices (VIB-B), are provided in LA ART Noise and Vibration Technical Report. In addition to VIB-A and VIB-B, GPA **recommends implementation of the following PDFs to ensure unforeseen impacts can be minimized to a less than significant level**. (Emphasis added)

CUL-PDF-A and CUL-PDF-C require pre-construction documentation of the condition of these two resources. CUL-PDF-B then is designed to address any identified impacts and reads as follows:

CUL-PDF-B Post-Construction Documentation of The Winery.

Post- Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).

CUL-PDF-D and E similarly reads as follows:

CUL-PDF-D Protection During Adjacent Construction.

Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will ensure that the El Grito mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for protecting historical resources during nearby construction, the following measures, at a minimum, should be implemented:

1. Vibration monitoring equipment (VIB-A) should be carefully installed so that it does not permanently damage the face of the El Grito mural.

2. The El Grito mural should be cushioned and buttressed from either side of the wall with padded wood supports. The padding may consist of insulating foam or similar material.

3. A protective barrier or barriers made from plywood should be installed over the front, back, top, and sides of the El Grito mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable panels or similar features to ensure the vibration monitors and mural can be visually inspected during construction monitoring (CUL-PDF-C).

4. Plastic tarp or polyethylene sheeting should be secured over the wood barriers to protect against the accumulation of dust or contact with materials such as uncured concrete or other liquids that could damage or mark the surface of the El Grito mural.

All of the protective measures described above should be installed and secured in such a way that does not damage the El Grito mural or the wall on which is it located. The barrier will not be physically attached to the El Grito mural or wall with screws, nails, or other fasteners.

CUL-PDF-E Construction Monitoring Plan (Built Resources).[9]

Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the Los Angeles Department of Cultural Affairs (DCA). The Construction Monitoring Plan will identify specific project milestones at which a qualified professional meeting the Secretary of the Interior's Standards for architectural history or historic architecture will be notified by the Project Sponsor or Project Sponsor's contractor to visit the site and observe and document the El Grito mural's condition. Details will be recorded in construction monitoring memorandums submitted to DCA. These milestones will include, at a minimum:

1. Pre-Construction: Before protection measures are installed (CUL-PDF-D), to confirm the baseline condition of the El Grito mural is still consistent with the information presented in the HABS-like documentation (CUL-PDF-C).

2. Pre-Construction: Once protection measures (CUL-PDF-D) are installed, to ensure they are sufficient, and their installation has not damaged the El Grito mural.

3. Construction: After each phase of active construction

4. Post-Construction: After construction is complete and protective measures have been removed. At this stage, pictures of the El Grito mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the El Grito mural before and after construction.

The Construction Monitor will also be included on notifications from the real-time vibration monitoring equipment (VIB-A).

In the event that damage to the El Grito mural not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the Project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68.

These are clearly measures intended to reduce impacts. The DEIR includes aesthetic, air quality, biological resource, cultural resource, noise, and wildfire PDFs. While several of the PDF are standard regulatory measures, or include components that are regulatory measures, or are actually physical design features of the Project, the PDFs are, for the most part, clearly measures intended to mitigate, minimize or avoid

impacts. The way the DEIR has relied on PDFs in making impact judgements is contrary to the requirement that project impact significance determinations under CEQA be made without consideration of mitigation measures.

The EIR for the proposed project thus understates Project impacts by improperly relying on PDFs, which are in fact mitigation measures, as a basis for concluding that Project impacts are less than significant. In Lotus vs. Department of Transportation (2014) 223 Cal.App.4th 645, the Court found that an EIR violated CEQA by incorporating proposed mitigation measures into the description of the project, and then basing its conclusion of less-than-significant impacts in part on those mitigation measures. This is exactly what has been done in the DEIR for the proposed Project. The Court found that this improperly compressed the analysis of impacts and mitigation measures into a single issue.

In Lotus, Caltrans was found to have certified an insufficient EIR based on its failure to properly evaluate the potential impacts of a highway project. The Lotus Court found that Caltrans erred by:

> incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the "avoidance, minimization and/or mitigation measures," as they are characterized in the EIR, are not "part of the project." They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA. Lotus at pp. 655-656 (emph. added).

The Court ordered Caltrans' certification of the EIR set aside, finding:

> [T]his shortcutting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decision-making and informed public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless. Id. at 658.

The analyses of both the proposed Project and PDFs are fatally flawed because many of the PDFs are in fact mitigation measures. The EIR thus understates impacts in a way that is far more extreme than what happened in Lotus. Under CEQA, significance determinations must be made without consideration of avoidance, minimization, and/or mitigation measures. The DEIR for the Project has violated this precept and understated and failed to identify impacts. The EIR is therefore fatally flawed on this additional ground. This must be corrected and the EIR recirculated, including pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

Footnote 7: Appendix G, page 99-100.

Footnote 8: Appendix G, page 101.

Footnote 9: It should be noted that a similar construction monitoring plan for significant impacts to archaeological resources, MM-CUL-A, is classified as a mitigation measure in the DEIR.

Response P700-24 This comment provides a general recitation and characterization of the Draft EIR and the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of project design features does not obscure project impacts. CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D and CUL-PDF-E are project design features, not mitigation measures to reduce potential cultural resources impacts as there are no significant or direct cultural resources impacts anticipated to the underlying resource. (See, e.g., Draft EIR, pages 3.5-35 to 3.5-46 [discussing CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E].) Within the Cultural Resources context, they are properly defined as project design features intended to provide additional environmental benefits rather than to mitigate a potential environmental impact. Certain project design features cross-reference mitigation measures included to reduce potential impacts from vibration, but this does not render the project design features as mitigation for potential significant cultural resources impacts as the commenter suggests. As discussed on pages 3.5-45 and 3.5-46 of the Draft EIR, Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, recommends the project design features be implemented where impacts would already be reduced to a less than significant level with the implementation of mitigation measures, and therefore the project design features would simply provide additional environmental protection. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, potential impacts from the proposed Project were otherwise analyzed and disclosed prior to the implantation of project design features.

Comment P700-25 **VI. THE DEIR FURTHER VIOLATES CEQA BY ENGAGING IN DEFERRED OR DELEGATED MITIGATION, AND BY USE OF MITIGATION MEASURES THAT LACK CLEAR STANDARDS.**

Metro proposes to depend on other agencies to carry out the vast majority of the mitigation measures in the DEIR, and specifies few, if any, parameters within which these other agencies must operate. The mitigation measures for construction impacts are both improperly delegated and deferred, with the City of Los Angeles, which will presumably issue the actual construction approvals, bearing the greatest share of the load. This deferral of mitigation and shrugging off responsibility for it reflects Metro's general attitude, expressed in its original Request for Information to LA ART, that "Metro does not envision taking a hands-on, prescriptive, or performance minded

approach to this project." (LA ART's Response to Metro's Request for Information, p. 8.) The DEIR reflects this hands-off approach to the Gondola Project.

Response P700-25 As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures would not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. The reference to Metro's unsolicited proposal process is noted, but the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR.

Comment P700-26 The DEIR identifies what it considers "significant" impacts only during the construction phase of the proposed Project, and only one impact that cannot be mitigated to less than significant. (DEIR, p. ES-58 [Noise and Vibration].) Other potentially significant construction impacts will supposedly be mitigated by a series of plans, yet to be developed. (See, e.g., Construction Traffic Management Plan [MM-TRA-B, at DEIR p. 3.17-67].)

The CEQA Guidelines are clear that an EIR may rely on mitigation that is deferred past project approval "provided that the agency (1) commits itself to the mitigation; (2) adopts specific performance standards the mitigation will achieve; and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure." Guidelines § 15126.4(a)(1)(B) (emphasis added). Section 15126.4(a)(2) requires that mitigation measures "be fully enforceable through permit conditions agreements, or other legally binding instruments."

Many of the mitigation plans are plainly deferred, since they are described in a sketchy, abbreviated manner, in the DEIR and are not required to be adopted prior to the issuance of the relevant building permit (see, e.g., MM-TRA-B, Construction Traffic Management Plan [DEIR, p. 3.17-67], prior to the issuance of a grading permit (VIB-A: Vibration Monitoring [DEIR, p. 3.13-73]), or prior to the start of construction (MM-TRA-C, Temporary Disaster Route Plan [DEIR, p. 3.17-69].) None is required to be fully fleshed out before Project approval, or during the public review of the DEIR. Since these are deferred mitigation measures, Metro must be held to the limitations on deferred mitigation set out in the CEQA Guidelines.

> Guidelines Section 15126.4(b) requires in part that:
>
> Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.
>
> All of the mitigation measures need to clearly state when the mitigation is needed to address the significant environmental impact and should be legally enforceable. This is best accomplished by specifying that specific permits shall not be issued until mitigation compliance has been demonstrated. In addition, the mitigation measures should include standards for achieving the requisite level of mitigation and potential actions that can feasibly achieve the performance standards. This is particularly important when mitigation responsibility has been delegated to another public agency.

Response P700-26 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation, and appropriately include enforcement mechanisms and performance standards that the mitigation measures are designed to achieve. For example, Mitigation Measure TRA-B provides that the Construction Traffic Management Plan would maintain "visibility to open pedestrian crossings" and "ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during construction," thus providing a specific performance standard for compliance. Mitigation Measure TRA-B also includes an enforcement mechanism through the requirement that the City of Los Angeles approve the plan prior to the issuance of a building permit for the proposed Project. Mitigation Measures VIB-A and TRA-C similarly comply with CEQA, requiring the preparation of their respective plans prior to the issuance of grading and building permits, respectively, for the proposed Project. Mitigation Measure VIB-A also includes specific performance standards, requiring that monitoring devices notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold such that the construction crew shall modify the equipment to ensure that this threshold is not exceeded. Mitigation Measure TRA-C likewise provides a specific performance standard, requiring that the plan include

information to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. In addition, the MMRP clearly defines when mitigation is required for potentially significant impacts, delineating the mitigation required for each potential environmental impact. In addition, when mitigation is required, the mitigation measure is defined and discussed in the context of the particular environmental impact. (See e.g., Draft EIR, pages 3.4-17 to 3.4-18, and 3.4--21 in Section 3.04, Biological Resources; pages 3.5-45 to 3.5-46, and 3.5-57 to 3.5--63 in Section 3.05, Cultural Resources; pages 3.7-14 to 3.7-15, 3.7-17 to 3.7-18, and 3.7-20 in Section 3.07, Cultural Resources; pages, 3.9-23 to 3.9-24, and 3.9-26 to 3.9-30 in Section 3.09, Hazards and Hazardous Materials; pages 3.11-38, and 3.11-42 to 3.11-43 in Section 3.11, Land Use and Planning; pages 3.13-72 to 3.13-76 in Section 3.13, Noise; pages 3.15-19, 3.15-23, and 3.15-25 to 3.15-26 in Section 3.15, Public Services; pages 3.17-39 to 3.17-44, 3.17-58, and 3.17-66 in Section 3.17, Transportation; pages 3.18-15 to 3.8-16, in Section 3.18, Tribal Cultural Resources; pages 3.19-20 to 3.19-21, and 3.19-25 in Section 3.19, Utilities and Service Systems).

Comment P700-27 A number of the mitigation measures in the DEIR do not comply with CEQA requirements that mitigation measures must be feasible and enforceable, that the EIR must identify any uncertainty in the effectiveness of the measures proposed, and that mitigation cannot be improperly deferred. As explained by the Court in Gardiner Farms v. County Kern (2020) 45 Cal.App.5th 814:

> The mitigation measures discussed in the EIR should be feasible. (Guidelines, § 15126.4, subd. (a); see Guidelines, § 15364 [definition of feasible].) . . .
>
> CEQA defines the term "'[f]easible'" as meaning "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (§ 21061.1; see § 21081, subd. (a)(3) [necessary findings relating to mitigation measures or alternatives].) The guidelines add "legal" factors to the list. (Guidelines, § 15364; see City of Marina v. Board of Trustees of California State University (2006) 39 Cal.4th 341, 356.) . . .
>
> CEQA imposes several requirements on mitigation measures. Section 21081.6, subdivision (b) provides: "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. Conditions of project

approval may be set forth in referenced documents which address required mitigation measures. . . .” Similarly, Guidelines section 15126.4, subdivision (a)(2) states: “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments.” The responsibility of the public agency does not end with simply imposing enforceable mitigation measures. “The public agency shall adopt a reporting or monitoring program for the . . . conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” (§ 21081.6, subd. (a)(1).) The purpose of a monitoring program is to ensure compliance with the mitigation measures imposed as conditions of the project approval.

The absence of specific performance criteria and a commitment by the County leads to the conclusion that the provisions in MM . . . are not “fully enforceable through permit conditions, agreements, or other legally binding instruments.” (Guidelines, § 15126.4, subd. (a)(2).) . . .

The requirement for a description of the mitigation is based on the general rule that “an EIR is required to provide the information needed to alert the public and the decision makers of the significant problems a project would create and to discuss currently feasible mitigation measures.” (Sierra Club v. County of Fresno, supra, 6 Cal.5th at p. 523.) The discussion provided must contain facts and analysis, rather than the agency’s bare conclusions or opinions. (Id. at p. 522.) Whether the facts and analysis included in the EIR’s discussion of currently feasible mitigation measures are sufficient to comply with CEQA depends on “whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ [Citations.] The inquiry presents a mixed question of law and fact. . .

Our conclusions that the EIR must identify and explain the uncertainty in the effectiveness of the mitigation measures proposed is a specific application of the general principles governing the discussion of mitigation measures. To fulfill its informational role, an “EIR must contain facts and analysis” (Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935). Uncertainty in the extent a measure will be effective, as well as the reasons for that uncertainty, are important facts that should be disclosed to the public and decision makers.

“[A]n EIR is required to provide the information needed to alert the public and the decision makers of the significant problems a project would create and to discuss currently feasible mitigation measures.” (Sierra Club v. County of Fresno, supra, 6 Cal.5th at p. 523.) To fulfill the EIR’s informational role, the discussion of the mitigation measures must contain facts and analysis, not bare conclusions and opinions. (Id. at p. 522.) The level of detail CEQA requires in the EIR’s discussion of facts and analysis of the mitigation measures depends on “whether

> the EIR includes enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.' " (Sierra Club v. County of Fresno, supra, at p. 516.) . . .
>
> Even if particular technologies and techniques had been identified and described in the EIR, this statement leaves the reader wondering if an applicant would be required to commit to any measures in its application or, alternatively, whether the applicant could omit those measures from its application because they were beyond the County's authority or control. . . .
>
> This "noncompliance with the information disclosure" requirements of CEQA "preclude[d] relevant information from being presented to the public agency" and the public. (§ 21005, subd. (a).) It constitutes a prejudicial violation of CEQA by itself and supports the conclusion that the failure of the mitigation measures to comply with the general rules against deferred formulation was prejudicial.

Response P700-27 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P700-26 for a discussion of the mitigation measures for the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation.

Comment P700-28 A number of the mitigation measures in the EIR are legally deficient because, as written, they are not fully enforceable[10] through permit conditions, agreements, or other measures. In addition, several of the mitigation measure are ineffective because they are only required if feasible, thereby vitiating their mitigation value. Other measures are ineffective because they lack standards and constitute improper deferral of mitigation.

> Footnote 10: Mitigation is required by CEQA to be fully enforceable, and to be carried out. Guidelines § 15126.4(a)(2); Lincoln Place Tenants Assn. v. City of Los Angeles (2005) 130 Cal.App.4th 1491, 1508.

Response P700-28 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation. Further, recognition in the Draft EIR that certain aspects of mitigation measures may be infeasible does not violate CEQA or render mitigation measures ineffective, but simply recognizes that all regulatory requirements will be adhered to the extent necessary for the pertinent resources. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure

supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-29 The value of mitigation measures MM-CUL-A and MM-CUL-F are vitiated by language that conditions implementation on the feasibility of the mitigation measure. Mitigation Measure MM-CUL-A reads in relevant part:

> **MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan**. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, **when prudent and feasible**. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda station. (Emphasis added).

The DEIR acknowledges that impacts to archeological resources are significant prior to mitigation. Because the mitigation specified "following practices that seek to avoid and preserve state-owned historical resources," (only) "when prudent and feasible," impacts to State-owned archeological resources at the Chinatown/State Park Station and El Pueblo de Los Angeles remain significant and unmitigated.

Mitigation Measure MM-CUL-F is similarly defective and reads as follows:

> MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station. After implementation of CUL-E, if it is found that the Park amenities (e.g., concessions and restroom) at the Los Angele State Historic Park have the potential to impact any significant features found during the testing phase of CUL- E, the location of the park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible. (Emphasis added)

Mitigation Measure MM-CUL-F (in combination of MM-CUL-E) is thus both an example of deferred analysis and improper deferral of mitigation. In addition, the mitigation value of the measure is destroyed by the language "as feasible. Impacts to archeological features at Los Angeles State Historic Park therefore remain significant. The DEIR must be corrected to identify these impacts and recirculated pursuant to CEQA Guidelines Section 15088.5 (a)(1), if the feasibility language is retained.

Response P700-29 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for

the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, Cultural Resources, of the Draft EIR, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation, such as archaeological testing. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures would not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review (for example, where ground disturbance and excavation is infeasible prior to project approval). As discussed in Topical Response I, recognition in the Draft EIR that certain aspects of mitigation measures may be infeasible following further study does not violate CEQA or render mitigation measures ineffective but simply recognizes that all regulatory requirements will be adhered to the extent necessary for the pertinent resources. Further, the language in Mitigation Measure CUL-A requiring SHPO consultation and "practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible" is verbatim from the statutory requirements of Public Resources Code section 5024(a).

Comment P700-30 The following mitigation measure is an example of improper deferral of mitigation because it lacks a clear standard:

> **MM-HAZ-A**: *Prepare a Soil and Groundwater Management Plan*. The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures are encountered during Project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater to classify them as either hazardous or nonhazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for offsite disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations, and be protective of workers and the environment.

The mitigation measure lacks a clear standard because it fails to disclose the specific applicable federal, state and local regulations that define the standard. In addition, the mitigation measure is deficient because it is legally unenforceable. It merely

requires that "Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan." It does not require that the Plan be reviewed and approved by a responsible agency prior to issuance of any grading or construction permits.

Response P700-30 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures, including Mitigation Measure HAZ-A, are consistent with the requirements of CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. In addition, conditions requiring compliance with regulations are common and reasonable mitigation measures under CEQA. Nevertheless, in response to comments requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Refer to Section 5.0, Corrections and Additions, of this Final EIR. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 71, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, discussing how the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-31 Metro and the DEIR fail to comply with CEQA in other respects related to ostensible mitigation measures. The DEIR sets out a long list of partial and full lane closures for periods lasting up to 30 weeks at a time on Cesar Chavez Avenue, Alameda Street, Main Street, Los Angeles Street, and adjacent to the State Historic Park. A few examples of these closures are at the DEIR's Hazards and Hazardous Materials Section at p. 3.9-32 (16 weeks, closures on Cesar Chavez and Alameda, under the

Alameda Station, Temporary Deck Option); p. 3.9-35 (16 weeks, require the full-time closure of the two southbound through lanes and the northbound curbside drop off lane during construction of foundations and columns under the No-Deck Option of the Alameda Station); p. 3.9-35 (30 weeks, closure of all lanes on Alameda Street between Cesar Chavez Avenue and Los Angeles Street for the Structural Steel and Gondola Equipment Erection of the Alameda Station); p. 3.9-37 (16 weeks, full time closure of one northbound lane on Alameda Street During Foundation and Columns phase of Alameda Tower construction); p. 3.9-39 (22 weeks, full closure of Alameda Street between Main Street and Alhambra Avenue, except one lane kept open for emergency and local access, for Structural Steel and Gondola Equipment Erection for Alameda Tower); p. 3.9-37 (22 weeks closure of two northbound lands on Alameda between Main and Alhambra for Structural Steel phase of Alameda Tower); p. 3.9-39 (15 weeks, full closure of one northbound land on Alameda Avenue, for Foundations and Columns phase of Alpine Tower); p. 3.17-57 ("full-time closure of all travel and parking lanes on North Broadway (the northbound left/center left turn lane, two northbound through lanes, the southbound through lane, the southbound through-right lane, and the northbound and southbound parallel parking lanes) between Cottage Home Street and Savoy Street, and all travel and parking lanes and shoulders on Bishops Road (the shared eastbound left/eastbound right turn lane, the westbound through lane, and the eastbound parallel parking lane and westbound parking shoulder) between North Broadway and Savoy Street during the approximately three-week deck removal phase.") For brevity's sake, this is only a partial list. Many more closures are identified in the DEIR.

The proposed Project would wreak havoc for weeks at a time on traffic, in multiple phases of the construction of Gondola stations and towers, causing lane closures in heavily-traveled portions of Los Angeles. The DEIR admits, for example, that the "temporary lane closures during construction would, by necessity, increase traffic volumes on the detour routes, which could increase traffic congestion on those routes." (DEIR, p. 3.17-58.) It concludes that "implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, as presented in Section 3.17.5, Mitigation Measures, below, would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities to ensure that the impact is less than significant with mitigation incorporated." (Id.) Similarly, the discussion in the DEIR subsection dealing with emergency response and evacuation plans finds all the lane closures to have less than significant impact only "with mitigation." (DEIR, p. 3.9-31.)

However, Metro does not commit itself to designing, setting performance standards for, or carrying out the mitigation that the DEIR concludes must be carried out to reduce the impacts of the various closures to less than significant levels. Instead, Metro essentially delegates responsibility for approving and carrying out this mitigation to the City of Los Angeles. The DEIR recognizes that "[a]ll the streets in the Project study area are under the jurisdiction of the City of Los Angeles"

(DEIR, p. 3.16-31), and states that, as to mitigation for the impacts of Project construction on traffic and transportation, "the ultimate design, construction process, and traffic handling would be subject to design review and approval by the City of Los Angeles and other reviewing agencies, so the potential construction work areas, and traffic handling could vary from the scenarios identified for the purposes of analysis in this EIR. However, impacts are expected to be less than significant with mitigation incorporated." (DEIR, p. 3.17-45.) That statement shows that Metro does not know whether what is described in the DEIR is what will actually be done on the ground. Metro cannot commit itself to what it admits it does not know. Nonetheless, the DEIR "expect[s]" impacts to be mitigated to less than significant, even if neither Metro nor the public now knows what the mitigation will be or how well it will (or will not) really work. This is a failure to provide substantial evidence that impacts will, in reality, be mitigated to less than significant levels.

Response P700-31 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures, including Mitigation Measure TRA-B, complied with CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. In addition, the City of Los Angeles is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR. Regarding LADOT specifically, a Transportation Assessment Memorandum of Understanding ("MOU") was prepared and approved by LADOT in accordance with LADOT's procedures and *Transportation Assessment Guidelines*. The MOU is included as Appendix A to the report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment* made available for public review in September 2022 on the proposed Project's SB 44 website. In addition, LADOT issued a memorandum regarding the Transportation Assessment for the Proposed Los

Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium on September 27, 2022.[12]

Comment P700-32 Nor does Metro prescribe full and specific performance standards. Mitigation Measure TRA-B: Construction Traffic Management Plan, prescribes a list of measures to lessen the impacts of lane closures, the presence of construction crews and materials, and so forth. However, it prescribes no performance standards for the effectiveness of these measures, except that land uses in proximity to Project construction must be accessible (the degree of accessibility is not specified), and emergency vehicles must be able to get through. (DEIR, p. 3.17-68-3.17-69.) There is no other standard provided for the success or effectiveness of these measures; how well they must work is not specified. The only performance standard provided is the yes/no test of whether or not they are carried out. Neither the decision maker (Metro) nor the public can know how successful any or all of the measures will be, nor is any provision made to determine how well they are or are not working. This violates the Guidelines' requirement for performance standards.

Despite this complete lack of standards (except for some access provisions), the DEIR confidently asserts that "transportation impacts would be reduced to a less than significant level." (DEIR, p. 3.17-69.) This is a conclusion that lacks substantial evidence; no standards have been articulated in the DEIR against which the Plans can be evaluated except the two access provisions. This violates Public Resources Code Section 21002 by allowing the approval of a project that has the potential to harm the human environment. In addition, CEQA's full public disclosure requirements are also put in jeopardy by this approach to mitigation. The Construction Traffic Management Plan and Temporary Disaster Route Plan do not need to be completed until "prior to the issuance of a building permit for the proposed Project" (id.), after the CEQA process is completed and without any guaranteed opportunity or process for public scrutiny of the finished plans. Finally, the DEIR does not discuss whether the various plans and measures will be made enforceable through permit conditions or other agreements. Metro has violated all provisions of CEQA Guidelines Section 15126.4(a)(2).

Response P700-32 Refer to Response P700-13 for a discussion of how the EIR need not provide evidence of whether an agency has "accepted" the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures comply with CEQA and would not impermissibly defer mitigation, as well as how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate

[12] Los Angeles Department of Transportation. 2022. Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium.

or otherwise feasible at the time of CEQA review, for example, where ground disturbance and excavation is infeasible prior to project approval. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Refer to Response P700-26 for a discussion of how Mitigation Measure TRA-B includes specific performance standards and does not impermissibly defer mitigation. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Further, Metro consulted with the City and State Parks pursuant to their roles as responsible agencies during the preparation of the MMRP. Refer to Response P700-6 for a discussion of how the City is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR.

Comment P700-33 Further, as previously noted, CEQA Guidelines Section 15097(a) states that "A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity **which accepts the delegation**; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program." (Emphasis added.)

The DEIR must include documentation demonstrating that specified responsible agencies have accepted delegation of mitigation monitoring and enforcement responsibility. In the absence of such a showing that responsible agencies have accepted the delegation, it cannot be concluded that impacts are less than significant. In addition, the absence of a mechanism for the Lead Agency to verify mitigation compliance, the measures are not legally enforceable. The following are examples of mitigation measures which have not be properly delegated to responsible agencies:

LUP-A: Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.

MM-TRA-A: Visibility Enhancements. Prior to the completion of construction of the proposed Project, and in coordination with and **subject to the approval of**

LADOT, the Sponsor shall design visibility enhancements for the following locations sufficient to alert drivers to the presence of pedestrians:

- Alameda Tower
- Chinatown/State Park Station

Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.

The mitigation relies on the City for the definition of the specific measures. There has been no demonstration that the measure will fully reduce significant impacts regarding hazards to less than significant levels. A clear standard has not been articulated. The measure lacks a mechanism to stop the Project, or require additional mitigation or additional environmental review, if the responsible agency believes impacts have not or cannot be reduced to less than significant levels, or the responsible agency fails to comply with the measure or to accept delegation.

Other measures that rely on delegation to responsible agencies and thus lack substantial evidence they will be implemented include:

MM-TRA-B: Construction Traffic Management. Plan: Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared **and submitted to the City for review and approval**. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with TRA-A shall be implemented if

determined to be appropriate in coordination with LADOT. In the absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations.

- Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT, and would be implemented by the proposed Project if deemed necessary.
- As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods.
- Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction.
- Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Conduct construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project bimonthly, or as otherwise determined appropriate by City Staff.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.

- During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

MM-TRA-C: Temporary Disaster Route Plan. Prior to the issuance of a building permit for the proposed Project, and in coordination with and **subject to the approval of LADOT**, the Sponsor shall submit a temporary disaster route plan to LADOT, which shall include street closure information and detour plans in order to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Construction activities and temporary lane closures could quickly be halted in event of an emergency to allow emergency vehicles to travel through the work zones. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation. The temporary disaster route plan would be prepared for the following locations:

- During those periods when construction of the Alameda Station, the Chinatown/State Park Station, and the Alameda and Alpine Towers require partial closure of one direction or full closure of both directions of Alameda Street or Spring Street.

MM-USS-A: Development of a Utility Relocation Plan. Before the start of construction-related activities, including the relocation of utilities, the Project Sponsor shall coordinate with the **LADWP, LASAN, SoCalGas, and Metro** to prepare a Utility Relocation Plan. The Project Sponsor shall also coordinate with the utility companies to minimize impacts to services throughout the Project and **obtain their approval of the Utility Relocation Plan**.

The Utility Relocation Plan shall be prepared, reviewed, and approved by a licensed civil engineer and, at a minimum, include the following:

- Plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of the proposed Project;
- Safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines; and

- Timing for completion of the utility relocation, which shall be scheduled to minimize disruption to the utility companies and their customers.

Response P700-33 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response P700-13 for a discussion of how the EIR need not provide evidence of whether an agency has "accepted" the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures comply with CEQA and would not impermissibly defer mitigation, as well as how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review, for example, where ground disturbance and excavation is infeasible prior to project approval. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Refer to Response P700-32 for a discussion of how the City is a responsible agency under CEQA for the EIR and was consulted during the preparation of the EIR. In addition, California Department of Parks and Recreation is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR.

Comment P700-34 In addition, the mitigation measures in question do not provide an adequate mechanism for the Lead Agency to ensure that implementation of the mitigation measures occurs in accordance with the specified Plans. In the absence of wording in the mitigation providing a mechanism for stopping the Project, pending additional environmental review, if the responsible agency does not demonstrate to the Lead Agency successful compliance with the mitigation measures by a time certain, it cannot be concluded that impacts are less than significant.

Furthermore, a mechanism for the Lead Agency to ensure and demonstrate successful compliance with these type of mitigation measures may not be feasible. In the instant case, the Lead Agency has limited permitting responsibility, and thus has

limited opportunity to stop project construction and initiate subsequent or supplemental environmental review if the mitigation measures are not implemented or the responsible agencies fail to fully mitigate impacts. This is because the Lead Agency's permitting responsibility, according to DEIR page 2-61 and as discussed above, is quite limited.

As documented on pages 2-57 to 2-62 of the DEIR, the preponderance of permitting responsibility is vested in other public agencies. The listed mitigation measures are therefore inadequate and the potential for impacts in these issue areas thus remains. The DEIR must be corrected to identify these impacts and recirculated.

Response P700-34 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation, and contain appropriate enforcement mechanisms and performance standards in compliance with CEQA. Refer to Response P700-33 for a discussion of how the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-35 **VII. THE DEIR FURTHER FAILS BECAUSE OF ITS INADEQUATE ANALYSIS OF LIGHT AND GLARE IMPACTS.**

As noted by the Court in the recent Save Our Capitol case: "Aesthetic issues also include the environmental impact of light and glare caused by a project. (See, e.g., Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist. (2013) 215 Cal.App.4th 1013, 1038, 156 Cal.Rptr.3d 449; Guidelines, Appendix G.)" The DEIR's analysis of the Project's light and glare impacts is fatally flawed.

This is an unusual project in its generation and distribution of light. First, while much of the Project's footprint is in urbanized Los Angeles, the alignment also crosses wildlife habitat, but the Biological Resources section of the DEIR devotes only three sentences to any potential impact on wildlife in the Gondola corridor from the effects of light from the Broadway Junction, the Stadium Tower, or the passage of hundreds of lighted gondola cabins over wildlife habitat in the proposed Project's corridor every night that there is a game or event at Dodger Stadium, or other times when the Project would be used. (DEIR, p. 3.4-19.)[11] Even this cursory discussion does not present actual evidence of lack of impact. Instead, it only observes that lighting would be low-level and directed at the area being illuminated, and that "[d]ue to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the Project is not anticipated to have an indirect impact on bird and bat species." (Id.) No citation to any authority is given for this passive-voice conclusion, and no actual

evidence is presented as to the amount of light that would be shed on birds, bats, or other wildlife and their habitat in the Project impact area.

Further, the discussion, such as it is, appears to focus on light from architectural features, and to exclude consideration of light shed from the gondola cabins, which will have interior lighting (DEIR, p. ES-11), and may have exterior lighted advertising, which itself separately contributes to visual and aesthetic blight. The DEIR makes clear that lighted "signage" will be integrated into the Gondola's "stations, the junction, towers, and cabins," including signage that "recognizes" Project sponsors; this is otherwise known as advertising. (Id.)

LA ART's response to Metro's Request for Information (RFI) states that "[i]n-cabin, on-cabin, and in-station advertising are a part of ARTT LLC's business model," and that [w]ith visibility from both the ground and as viewed by riders, the ART system provides a significant and valuable opportunity for potential sponsors and advertisers. Such sponsorship is often packaged with advertising opportunities and can provide substantial upfront and operating capital to subsidize system benefits." (RFI, p. 36.) The statement is both an acknowledgement that light from the cabins will reach the ground, and that cabins may have interior and exterior advertising; it is reasonable to assume that such advertising may be lighted.

The DEIR must be revised and recirculated to identify the full range of lighting that the Gondola will contribute to areas that are not fully urbanized and that provide habitat for species that require some darkness, and to analyze this light's potential impacts on such wildlife. The DEIR must also be revised and recirculated to identify the full range of lighting impacts that the Gondola will contribute in terms of aesthetic impacts and glare.

Footnote 11: The DEIR estimates that 6,000 game attendees (12,000 trips for round-trip) would ride the proposed Project in 2026 and 10,000 game attendees (20,000 trips for round-trip) would ride the proposed Project in 2042 per game, reaching the estimated capacity of the system." (DEIR, p. 3.17-24, emphasis added.) The original proposal estimated cabin capacity at 30-40 passengers each. (Proposal, p. 9.) If the Project carried 12,000 passengers (6,000 each way) on a game night, and if each cabin carried 30 passengers, a total of 400 cabins would fly over the Gondola's route each game/event night; if a cabin carried 40 passengers, it would be 300 cabins, with all their light.

Response P700-35 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the operational impacts to lighting from the proposed Project, which would be less than significant. As discussed in Section 3.01, Aesthetics, of the Draft EIR, at page 3.1-53, a Lighting Study was conducted to determine the proposed Project's potential environmental impacts resulting from its lighting and

illuminated signage program, evaluating impacts with respect to light trespass and glare. The proposed Project would incorporate project design features related to lighting and would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area. Refer to Response P700-37 for additional discussion of the Draft EIR analysis of light and glare. Further, refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR.

Refer to Section 3.04, Biological Resources, for a discussion of the proposed Project's potential impacts on wildlife, including how the proposed Project is not anticipated to have an indirect impact on bird and bat species due to proposed Project lighting. Refer to Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin, and lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. If lighting at stadiums were a major attractant to birds during migration, there should be many more examples of this phenomenon, given the large number of professional sports (e.g., baseball, football, soccer), and concert events that occur at such venues at night during spring and fall migratory periods. Further, refer to Responses P700-38 and P700-39 for a discussion of how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project.

Refer to Topical Response K, Signage and Lighting, for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes Key Observation Points ("KOPs") updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study. The proposed Project lighting would include low-level lighting for security and wayfinding purposes. The cite to LA ART's response to Metro's Request for Information predates the initiation of environmental review for the proposed Project

and accordingly does not have any bearing on the sufficiency of the Draft EIR. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-36 Second, should a reader seek further information on this subject, Appendix C, the technical appendix considering light impacts, fails to provide the clear and readily understandable information to the public that is one of the main purposes of an EIR. (Pub. Res. Code § 21061 ["The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which the proposed project is likely to have on the environment[.]")

The Appendix is consistently confusing, often using technical terms without explaining them or providing a context and/or examples a layperson can understand. It uses terms like "candelas," "vertical and horizontal footcandles," and "inverse square law" (DEIR, p. ES-23, 3.1-8; Appdx. C, p. 22) without providing clear explanations or real-world equivalents that would allow laypersons to understand what the terms mean and what the reader is being told, and goes so far as to discuss physics and Newtonian laws, presenting material that many lay readers may find indecipherable. (Appdx. C's Lighting Study, p. 6.) This is a violation of Guidelines Section 15140, which directs that EIRs should be written in plain English. In this respect, the DEIR is less a useful document of information for decision makers and the public on the effects of light from the Gondola than it is a reference manual for those already expert in the subject. Not only must the discussion be expanded to identify all potentially significant impacts of light from the proposed Project, but it must be rewritten in plain English and recirculated, as the Guidelines require.

Response P700-36 Refer to Response P700-35 for discussion of the aesthetic impacts of the proposed Project, including light and glare, which would be less than significant. The Draft EIR addressed impacts from light and glare, in Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Proposed Project operations would result in a less than significant impact for light and glare, as explained in plain language on pages 3.1-52 to 3.1-53 of Section 3.01, Aesthetics, of the Draft EIR. The Lighting Study is a technical study that utilizes industry-specific language, and remains available to the public should the need for additional information arise upon reviewing Section 3.01. Section 3.01 serves to summarize the technical information in Appendix C for public consumption. CEQA Guidelines section 15140's requirement that the EIR "shall be written in plain language . . . so that decision makers and the public can rapidly understand the documents" is inapplicable to technical documents attached as appendices to the EIR. CEQA Guidelines section 15147 clarifies that "[t]he information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public" while "highly technical and specialized analysis and data in the body of an EIR should be avoided through

inclusion of supporting information and analyses as appendices to the main body of the EIR." CEQA does not require that the EIR translate the technical details of the technical appendices into layman's terms, but requires "a 'general description' of the project's technical characteristics. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project.

Comment P700-37 Third and finally, the DEIR presents as "proof" that particular Project light sources will comply with a particular light standard – and will not have a significant impact – solely because that light source is exempt from the particular standard. (See, e.g., Appendix C, p. 88 ["[T]he proposed Project's lighting and signage would comply with the [Cornfields Arroyo Specific Plan] requirements where they apply at the Chinatown/State Park Station because the Project's light fixtures and signage are exempt from the [Cornfields Arroyo Specific Plan] exterior lighting requirements."]) The DEIR also claims that the Project's light sources comply with the Cal Green (state building energy code) standards in that they are exempt from those standards. (Id.) This is faulty reasoning; merely because a particular source of light is exempt from a standard does not mean that the light it spreads has no significant impact.

Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th 1099, at 1109, holds that "notwithstanding compliance with a pertinent threshold of significance, the agency must still consider any fair argument that a certain environmental effect may be significant." The case holds that even if a project actually does comply with an applicable standard, the agency may not conclusively presume that such compliance guarantees that the project will have no significant environmental impact. Analogously, and perhaps with greater force, if a particular light source is exempt from an applicable standard, an agency should not be able to conclusively presume that the source will have no significant impact, unless the agency presents specific, factual proof to support that conclusion.

The existence of an exemption is not evidence, let alone substantial evidence, of no significant impact, as the DEIR assumes. It is simply a failure by the lead agency, and an omission by the DEIR, to disclose, study and mitigate potentially significant impacts. The agency that set the standard may have created the exemption for many reasons, such as cost, technical feasibility, or lack of agency resources to enforce the standard without the exemption, rather than lack of potentially significant impact. Considerations such as feasibility can excuse an agency from certain types of mitigation for a project's significant environmental effects (Pub. Res. Code §§ 21002, 21081), but they do not and cannot excuse the lead agency from identifying all significant impacts of a project.

The exemptions from regulatory standards cited in the DEIR should not be regarded, per se, as evidence – let alone substantial evidence – of lack of significant impact. On the contrary, a lead agency is required to "use its best efforts to find out and disclose

all that it reasonably can." (Guidelines § 15145.) The agency may not simply note the exemption and stop the analysis, as the DEIR does. Lack of an applicable standard is not a get-out-of-jail-free card for environmental analysis. The DEIR must be revised and recirculated to examine the potential impact of Project light sources, regardless of their alleged exemption from particular standards.

Response P700-37 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the operational impacts to lighting from the proposed Project.

The analysis of light and glare in the Draft EIR provides substantial evidence to support the conclusion that the impact would be less than significant.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, at page 3.1-53, a Lighting Study was conducted to determine the proposed Project's potential environmental impacts resulting from its lighting and illuminated signage program, evaluating impacts with respect to light trespass and glare. The proposed Project would incorporate project design features related to lighting and would not create a substantial source of light or glare that would result in adverse effects to day/ nighttime views of the area, and would comply with applicable City regulations related to light and glare. Therefore, as the Lighting Study concluded, impacts would be less than significant. As discussed on page 3-1-57 of Section 3.01, Aesthetics, of the Draft EIR, AES-PDF-A would be implemented to ensure that (i) Building Lighting would not exceed 60 watts; (ii) Building Lighting outdoor luminaires would not exceed 6200 initial lumens; (iii) Sign Lighting luminance would not exceed 10,000 cd/m2 during the day or 300 cd/m2 at night; (iv) sign lighting luminance would transition smoothly from daytime luminance to nighttime luminance and vice versa; and (v) illuminated signs that have the potential to exceed 30 cd/m2 would include an electronic control mechanism to reduce sign luminance to 300 cd/m2 at any time when ambient sunlight is less than 100 footcandles.

As explained in Section 3.01, Aesthetics, of the Draft EIR, at page 3-1-32, with respect to light and glare, the proposed Project would have a significant impact if it would "[c]reate a new source of substantial light or glare which would adversely affect day or nighttime views in the area." As explained on page 13 of the Lighting Study, the City of Los Angeles CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The change in ambient nighttime levels as a result of project sources; and
- The extent to which project lighting would spill off the Project sites and affect adjacent light-sensitive areas.

Based on these factors, the Lighting Study evaluated whether the proposed Project would create a significant impact with regard to artificial light and glare if:

- The Project Building Lighting illuminance is greater than 2.0 foot-candles at a residential property boundary.
- The Project Sign Lighting illuminance is greater than 3.0 foot-candles at a residential property boundary.

or:

- The Project Building Lighting or Sign Lighting creates new high-contrast conditions visible within the field of view from a residential property.

And based upon the California Vehicle Code:

> The Project would create a significant impact with regard to drivers of motor vehicles if the maximum measured brightness of the light source within 10 degrees from the driver's normal field of view exceeds 1,000 times the minimum measured brightness in the driver's field of view, except when the minimum values are less than 10 foot-lamberts, or at minimum luminance less than 10 foot-lamberts, the maximum measured source brightness exceeds 500 fL plus 100 times the angle, in degrees, between the driver's field of view and the light source.

In addition to these significance thresholds, as part of the Lighting Study's analysis of light trespass, the Lighting Study also evaluated the proposed Project for compliance with a number of regulatory standards to support the conclusion that light trespass impacts would be less than significant. Specifically, the Lighting Study analyzed the proposed Project for compliance with: the Los Angeles Municipal Code (LAMC), CALGreen, the CASP, and the RIO, discussed below. While the light trespass requirements of the LAMC generally do not apply to lighting for projects within the public rights-of-way, the Lighting Study analyzed the proposed Project with respect to the LAMC requirements to present a conservative analysis of any potential impact. The Lighting Study concluded that the proposed Project's lighting and illuminated signage would comply with the LAMC light trespass illuminance requirements, and that the lighting and illuminated signage would either be in compliance with or exempt from CALGreen, the CASP, and the RIO requirements.

The CALGreen, CASP, and RIO standards provide for very low light trespass levels for certain types of lighting. Importantly, however, these standards recognize that these light trespass levels are not appropriate for all types of lighting and therefore provide exemptions for certain types of lighting. For instance, as explained on page 2 of the Lighting Study, CALGreen exempts lighting required for ADA access and for public right of way illumination. Signage lighting is also exempt from CALGreen. Similarly, as explained on page 2 of the Lighting Study, the CASP includes Section 2.3, paragraph E.2, Exemptions, which states "The following outdoor lighting fixtures and activities are exempt from the requirements of this section: . . . Internally illuminated signs", "[a]rchitectural lighting whether it is freestanding or attached to a building,

provided the lighting does not exceed an intensity of 60 watts" and "[p]edestrian lighting that does not have an intensity greater than 60 watts." Therefore, because all proposed Project signs are internally illuminated, they are exempt from the CASP light trespass requirements. In addition, the proposed Project's building lighting is either architectural lighting or pedestrian lighting and, as discussed above, the proposed Project includes AES-PDF-A which stipulates that all architectural lighting or pedestrian lighting is less than 60 watts. Therefore, the proposed Project is exempt from the CASP light trespass requirements.

Regarding the RIO, the Lighting Study concluded that in certain locations the proposed Project would exceed the RIO 0.20-foot candle maximum light trespass illuminance at the proposed Project property line and the 0.01 footcandle maximum light trespass illuminance at 15 feet beyond the proposed Project property line. Although the proposed Project would exceed the RIO requirements in certain locations, which would represent a conflict with the RIO, the environmental effect of the lighting levels would not represent a significant impact on the environment. The areas where the proposed Project lighting would exceed the RIO at the eastern boundaries of the proposed location of the Alameda Station, the Alpine Tower, and where the cabins travel along the proposed Project alignment from W. College Avenue to Alameda Station are urban areas with existing lighting that exceeds the maximum illuminance defined by RIO. These urban areas require higher illuminance for safety and security. Further, the locations of the proposed Project's components within the RIO District are more than 2,600 feet from the LA River, and therefore have no direct influence on the lighting within or adjacent to the LA River. Additionally, as discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, the proposed Project would seek relief from the RIO District and would seek a Specific Plan pursuant to LAMC section 11.5.7 to provide for consistent application of proposed Project design standards, limitations, and operational measures, including lighting standards approved by the City in recognition of the proposed Project's unique characteristics, including unique opportunities for public benefits and unique constraints posed by the proposed Project's location which are not experienced by other sites. With approval of the Specific Plan, there would be no conflict with the RIO.

Therefore, the analysis of light and glare in the Draft EIR provides substantial evidence to support the conclusion that the impact would be less than significant. By way of the analysis in the Lighting Study, which evaluated impacts using established significance thresholds under the CEQA Guidelines, City of Los Angeles CEQA Thresholds Guide and the California Vehicle Code, and further supported the analysis with an analysis of compliance with regulatory standards, Metro considered and resolved every fair argument that can be made about the possible significant environmental effects to lighting of the proposed Project, using its best efforts to find out and disclose all that it reasonably could. (CEQA Guidelines § 15145.)

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment P700-38 **VIII. THE DEIR VIOLATES CEQA BY FAILING ADEQUATELY TO ADDRESS BIOLOGICAL RESOURCES IMPACTS**.

According to DEIR page 3.4-12, among the special-status wildlife species identified in the California Natural Diversity Database (CNDDB) in the study area are: western mastiff bat (Eumops perotis californicus; SSC), hoary bat (Lasiurus cinereus; tracked by CNDDB), big free-tailed bat (Nyctinomops macrotis; SSC). Furthermore, DEIR page 3.4-16 indicates the presence of possible bat habitat in the Project vicinity:

> With the presence of potentially suitable tree roosting habitat in the BSA in the vicinity of the proposed Alameda Station and Dodger Stadium Station sites, and the proximity of the SR-110 overpass to the Stadium Tower, as well as historic records of three special-status bat species (western mastiff bat, hoary bat, and big free-tailed) in the vicinity of the BSA, there is a remote chance that an individual or small group of special-status bats could occur in the BSA.

Although the DEIR did address the potential for construction-related impacts to bats and to provide mitigation for significant impacts, it did not include a robust analysis of the potential operational impacts of the Project on bats. Additionally, statements regarding potential operational impacts on bats and bat behavior are not supported by substantial evidence.

Response P700-38 The Draft EIR addressed impacts to biological resources, including special status bat species, in Section 3.04, Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on pages 3.4--13 and 3.4-17 in Section 3.04, the proposed Project has the potential to impact special status bat species as result of tree removal during construction. These impacts would be reduced to less than significant with implementation of Mitigation Measure BIO-A. Further, operational impacts to bats are discussed on page 3.4-19, in Section 3.04 and would be less than significant because the proposed Project would operate in a highly disturbed urban area, and therefore bats are unlikely to be impacted by the relatively minor change in environment. Moreover, lighting would be low-level and primarily integrated into the architectural features. Exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the proposed Project is not anticipated to have an indirect impact on bird and bat species. Given the relatively short length of the alignment, the heavily urbanized nature of the BSA, and limited amount of suitable foraging and nesting habitat, special-status birds and raptors are not expected to occur in the BSA, except potentially as transient migrants. As discussed in Section 3.04, and Appendix E of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR, the proposed Project is

not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment P700-39 The proposed Project includes the operation of moving lighted gondolas, suspended 159-175 feet in the air. As noted by Orbach and Fenton, bat collisions "often occur with lighted objects, suggesting ambient light may deleteriously affect obstacle avoidance capabilities."[12] As noted by Orbach and Fenton:

> Many anecdotal reports describe bats colliding with large stationary objects such as television towers [1–6], lighthouses [7], and windows [8–9] that should have been detected by echolocation and avoided. Furthermore, many of these collisions involve illuminated objects that should have been detected by vision.[13]

The proposed Project would potentially increase the hazard risk by providing what are essentially low-flying lighted objects. The presence of the Project may thus pose increased hazards to local bats, and may result in bat avoidance of the area, or changes in bat behavior.[14] This needs to be more fully addressed in the EIR for the proposed Project, given the potential for significant impacts to bat species.

Footnote 12: See Orbach DN, Fenton B (2010) Vision Impairs the Abilities of Bats to Avoid Colliding with Stationary Obstacles. PLoS ONE 5(11): e13912. doi:10.1371/journal.pone.0013912 , available at: https://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0013912&type=printable

Footnote 13: See, e.g.,

1. Van Gelder RG (1956) Echolocation failure in migratory bats. Transactions of the Kansas Academy of Science 59: 220–222.
2. Ganier AF (1962) Bird casualties at a Nashville TV tower. Migrant 33: 58–60.
3. Gollop MA (1965) Bird migration collision casualties at Saskatoon. Blue Jay 23: 15–17.
4. Avery M, Clement T (1972) Bird mortality at four towers in eastern North Dakota: Fall 1972. The Prairie Naturalist 4: 87–95.
5. Zinn TL, Baker WW (1979) Seasonal migration of the hoary bat, Lasiurus cinereus, through Florida. Journal of Mammalogy 60: 634–635.

6. Crawford RL, Baker WW (1981) Bats killed at a north Florida television tower: a 25 year record. Journal of Mammalogy 62: 651–652.

7. Saunders WE (1930) The destruction of birds at Long Point lighthouse, Ontario, on four nights in 1929. The Auk 47: 507–511.

8. Test FH (1967) Indicated use of sight in navigation by molossid bats. Journal of Mammalogy 48: 482–483.

Footnote 14: See also, for example: https://www.researchgate.net/publication/272889669_-Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions, and https://movementecologyjournal.biomedcentral.com/articles/10.1186/s40462-020-00238-2 and https://reader.elsevier.com/reader/sd/pii/S0269749122007667?token=E2D5544E3FDCBC1CB36C2B634EA59800E212792181BC74C9B3EAD90A439962D2CE3C12F07FA69675E047963208206203&originRegion=us-east-1&originCreation=20230108225259

Response P700-39 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components, many of which are lighted themselves, or illuminated by existing ambient urban light sources. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. Although some studies indicate a propensity for bats to collide with lighted structures such as radio and television towers and lighthouses, these are generally isolated structures in rural areas where the lighting would stand out from surroundings. In contrast, the lighting associated with the proposed Project would contribute only negligibly to the ambient light in this urban environment. Refer to Response P700-38 for a discussion of how the Draft EIR analyzed operational impacts to birds and bats, concluding that the operation of the proposed Project would have a less than significant impact on bird and bat species, as because the proposed Project would operate in a highly disturbed urban area, birds and bats are unlikely to be impacted by the relatively minor change in the environment. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment P700-40 **IX. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO FULLY MITIGATE CULTURAL RESOURCE IMPACTS.**

The mitigation measures and PDFs provided for in the DEIR to address vibration related impacts of the Project on historic resources are inadequate to avoid significant impacts. CUL-PDF-8 requires:

> **CUL-PDF-B Post-Construction Documentation of The Winery.**
>
> Post- Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).

First, this is clearly a mitigation measure, not a Project Design Feature. Second, the measure is inadequate because it fails to guarantee that the Project sponsor will retain sufficient financial resources to make any necessary repairs. It may therefore not be feasible. A mitigation measure requiring that the Project sponsor post a bond in an amount sufficient to cover any needed repairs is required to ensure adequate financial resources to address any impacts to the Winery and El Grito mural and to render this mitigation measure feasible. Third, because this is a PDF, it is not legally enforceable through permit or other conditions, and no monitoring responsibility has been established. Fourth, is fails to require independent review of repairs by a responsible agency to ensure that all required work has been completed, and completed consistent with the Secretary's Standards.

Response P700-40 Refer to Response P700-24 for further discussion of CUL-PDF-B. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CUL-PDF-B is a project design feature because it is not intended to reduce potential cultural resources impacts as there are no significant or direct cultural resources impacts anticipated to the underlying resource. Further, all of the project design features, and mitigation measures identified and analyzed in the Draft EIR are included in the mitigation monitoring and reporting program set forth in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR and would be mandatory elements of the proposed Project.

Comment P700-41 MM-VIB-A is not legally enforceable as written. The measure fails to require review and approval of the specified Vibration Monitoring Plan by the Lead or a responsible agency. It also fails to require notification of the responsible monitoring agency should vibrations in excess of the standard be detected, to require all work in the vicinity be stopped pending identification of an appropriate change in construction equipment, to require review and approval by a responsible monitoring agency of any changes to the construction equipment to be used in response to potentially

damaging vibration detection, or to ensure that construction activity will not be resumed until it has been determined that construction can be undertaken without exceeding the vibration standard. This measure therefore does not reduce impacts to a level which is less than significant:

MM-VIB-A: Vibration Monitoring. Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:

- Vibration Monitoring Equipment: the placement of vibration monitoring equipment **at least 26 feet away** from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices.

- Modification of Vibration Equipment: The monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.

In addition, the DEIR fails to explain why vibration monitoring equipment would be placed "at least 26 feet away" from the historic resources of concern. As written, would placement of the monitoring equipment 100 miles away comply with the measure, even though such placement would not allow for detection of damaging vibration levels? The measure needs to specify the maximum distance away from the historic resources that monitoring equipment can be located and still be effective, by specifying that monitoring equipment shall not be located more than x feet from …. As written, the measure is insufficient to reduce impacts to a level considered less than significant.

These same comments apply to Mitigation Measures MM-VIB-B which suffers from the same problems as MM-VIB-A, which render the measure ineffective in reducing impacts to a level considered less than significant:

- **MM-VIB-B:** ***Force Adjustable Ground Compaction Devices***. For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery:

- **At a distance of 26 feet or more** from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities.

- Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), El Grito Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools.

The DEIR has failed to provide sufficient mitigation to reduce construction impacts on historic resources to a level considered less than significant. Including pursuant to Guidelines Section 15088.5(a), the DEIR must be corrected and recirculated for public comment.

Response P700-41 Pursuant to CEQA Guidelines section 15126.4(A)(2), the EIR's mitigation measures will be fully enforceable through the adoption of conditions of approval and the Mitigation Monitoring and Reporting Program. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Potential vibration impacts resulting from the proposed Project are associated only with construction of the proposed Project; no vibration impacts were identified for operation of the proposed Project. Vibration impacts associated with construction of the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. CEQA only requires the discussion of mitigation measures that the lead agency determines are feasible and would be effective. The use of non-vibrating equipment or hand tools for construction operations within 26 feet of Avila Adobe, *El Grito* mural wall, and The Old Winery was determined to be feasible and effective in consultation with the Project's construction contractor. For instance, instead of using vibratory rollers the Project's construction contractor could use hand tampers. As explained in detail at pages 3.13-72 to 3.13-73 of Section 3.13, Noise, of the Draft EIR, Mitigation Measure VIB-A requires placement of vibration monitoring equipment at least 26 feet away from Avila Adobe, *El Grito* mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at Alameda Station requiring heavy equipment or ground compaction devices, and this equipment would notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold so that the construction crew would modify the construction equipment to ensure that the vibration damage threshold is not exceeded. Twenty-six feet was identified in the Mitigation Measures because the reference vibration levels for vibration generating equipment are provided at 25 feet. In addition, within 25 feet from Avila Adobe (1970s addition), *El Grito* Mural and The Old Winery only non-vibrating equipment or hand tools would be used. Accordingly, 26 feet was

selected as the relevant measuring point for the Mitigation Measure VIB-A and VIB-B because it is where vibration generating equipment could be located. The exact location for the vibration monitoring equipment would be provided in the Vibration Monitoring Plan but it is anticipated that the vibration monitoring equipment would be approximately 26 feet away from Avila Adobe (1970s addition), *El Grito* Mural and The Old Winery to ensure that vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. In response to this comment and to clarify the intent of Mitigation Measure VIB-A, refer to Section 5.0, Corrections and Additions, in this Final EIR, for a discussion of how Mitigation Measure VIB-A has been updated to read "*approximately* 26 feet" in place of "*at least* 26 feet." Mitigation Measure VIB-B requires that, for construction work occurring at Alameda Station, at a distance of 26 feet or more from the Avila Adobe, *El Grito* Mural and the Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet and, if the ground compacting equipment cannot achieve the assume reference level, equipment with less than 0.21 PPV, in/sec, at 25 feet, non-vibrating equipment, or hand tools would be required for ground compaction activities. In addition, any ground compaction or excavation/drilling operations within 26 feet of Avila Adobe, *El Grito* Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. Refer to Appendix M, Noise and Vibration Technical Report, of the Draft EIR, Tables 6-11 and 6-12, for technical assessment of the impact thresholds for Avila Adobe, *El Grito* Mural, and The Old Winery structures and demonstration of the effectiveness of Mitigation Measures VIB-A and VIB-B. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and *El Grito* Mural, would be less than significant. This determination is supported by expert analysis provided in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, which discuss the vibration impacts from construction of the proposed Project. This comment does not show that the additional measures proposed would result in a greater level of effectiveness than the measures incorporated in the Draft EIR. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-42 **X. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO PROPERLY IDENTIFY OR MITIGATE LAND USE AND PLANNING IMPACTS.**

CEQA requires that a DEIR's analysis under the Land Use topic disclose and analyze how the Project is *inconsistent* with plans, programs, statutes, ordinances and policies adopted to avoid or mitigate environmental impacts. The Land Use and Planning section of the DEIR, however, consists of an extended "analysis" of the Project's *consistency* with these documents. This methodological flaw permeates the DEIR's

analysis, masks numerous conflicts, and misleads the public about the Project's irreconcilable conflicts with multiple binding land use policies.

Response P700-42 The Draft EIR addressed consistency with applicable land use policies and ordinances in Section 3.11, Land Use and Planning, of the Draft EIR. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the Project Study Area. CEQA Guidelines section 15126(d) requires that an EIR discuss inconsistencies with applicable land use plans that the decision-makers should address. Separately, Appendix G of the CEQA Guidelines recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines section 15382. "An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment."[13] Analysis of conflicts and consistency with applicable plans is included in Section 3.11, Land Use and Planning, of the Draft EIR.

Under the Planning and Zoning Law (Government Code Section 65000 et seq.), strict conformity with all aspects of a plan is not required. Generally, given that land use plans reflect a range of competing interests, a project is considered consistent with the provisions of the identified regional and local land use plans if it meets the general intent of the plans, and would not preclude the attainment of the primary intent of the land use plan or policy. Accordingly, if a project is determined to be inconsistent with specific objectives or policies of a land use plan, but is largely consistent with the land use goals of that plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. In addition, inconsistency with specific objectives or policies of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment. Rather, to be "consistent," the project must be compatible with the objectives, policies, general land uses and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan."[14]

Analysis of conflicts and consistency with applicable plans is included in Section 3.11, Land Use and Planning, of the Draft EIR.

Comment P700-43 **A. Los Angeles State Historic Park General Plan - Inadequate Mitigation.**

[13] Continuing Education of the Bar. Practice Under the California Environmental Quality Act, Section 12.34.
[14] Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

Because the proposed Project is not consistent with the Los Angeles State Historic Park General Plan,[15] the DEIR identifies the need for the following mitigation measure:

> **MM-LUP-A** *Obtain a Los Angeles State Historic Park General Plan Amendment*. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.

This mitigation measure is outside of the control of the Lead Agency. (As discussed above, its absence as part of this process should also be considered a violation of CEQA's project description requirements. The General Plan Amendment and Specific Plan, and all other land use plan amendments, should be concurrently provided to the public and decision makers along with a recirculated DEIR.) In an absence of a showing that the responsible agency is willing to implement this so-called mitigation measures, a finding that plan consistency impacts can be reduced to a level which is less than significant is not supported by substantial evidence. The potential for Los Angeles State Historic Park General Plan consistency impacts remains.

Footnote 15: Available at: https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHPGeneral-Plan.pdf

Response P700-43 As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project's Chinatown/State Park Station would be consistent with the goals and guidelines of the LASHP General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. State Parks has determined that the proposed Project would be inconsistent with the LASHP General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the LASHP General Plan. The LASHP General Plan Amendment is subject to the review and approval by the State Park and Recreation Commission, which retains its independent authority related to the proposed Project. As the agency having land use authority over the park will be the Responsible Agency implementing the General Plan Amendment, there is substantial evidence that any potential inconsistencies with the General Plan will be addressed through that General Plan Amendment process. Refer to Topical Response F, Los Angeles State Historic Park for a discussion of the LASHP General Plan Amendment. Refer to Response P700-17 for a discussion of how the Draft EIR is not required to include the land use planning documents within the purview of a responsible agency with the Draft EIR. This comment and the comments raised in this letter do not raise any

significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-44 **B. Failure to Identify the Project's Inconsistency With the 2020-2024 Regional Transportation Plan/Sustainable Communities Strategy.**

The Project as proposed is not consistent with the RTP/SCS.[16] The Project is not included in the City's Mobility Plan 2035[17] or in the Transportation System Project List[18] used in preparing the Regional Transportation Plan (Connect SoCal 2020 or the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy),[19] and this needs to be explained in the DEIR. Furthermore, the Project is not consistent with almost all of the RTP/SCS goals, as detailed in this comment letter and summarized in the analysis contained in the following table.

Footnote 16: The RTP/SCS is available at: https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020

Footnote 17: Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

Footnote 18: Available at: https://scag.ca.gov/sites/main/files/fileattachments/0903fconnectsocal_project-list_0.pdf?1606000813

Footnote 19: Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocalplan_0.pdf?1606001176

Response P700-44 The Draft EIR addressed the proposed Project's compatibility with the 2020-2045 RTP/SCS in Section 3.11, Land Use and Planning, of the Draft EIR. As discussed on page 3.11-4, of the Draft EIR, the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), called Connect SoCal, serves as a long-range regional transportation planning tool used to build upon and expand land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern. As noted on page 8 of Connect SoCal, "SCAG is just one part of a large body of governments and public organizations that collectively plan, construct, operate and maintain the region's transportation system. SCAG's work helps facilitate implementation, but the agency does not directly implement or construct projects." As such, as a long-range regional transportation planning tool, not every proposed transportation project is included in Connect SoCal, and the proposed Project need not be included in such regional planning documents in order to be consistent with their goals and policies.

As noted in the Draft EIR, the proposed Project would introduce a unique new mode of transit for travelers between LAUS and Dodger Stadium. Implementation of the proposed Project would create new, as well as improve, existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, the Chinatown Metro L Line (Gold) Station, and several regional and local bus lines serving the Project Study

Area. Additionally, the proposed Project would reduce air quality emissions by reducing vehicle trips, as discussed in Section 3.03, Air Quality, of the Draft EIR. As such, the proposed Project would be consistent with Connect SoCal's ten main goals, which are expanded upon on pages 3.11-44 through 3.11-46, in Table 3.11-2 in the Draft EIR. As such, the proposed Project would not conflict with Connect SoCal's applicable goals and impacts to consistency with this plan would be less than significant. The proposed Project is also consistent with multiple Connect SoCal guiding principles related to reducing congestion and improving air quality, as discussed on page 1-7 of the Draft EIR. Refer to Response P700-45 for further discussion of the proposed Project's consistency with the RTP/SCS' goals.

Comment P700-45 DEIR Table 3.11-2 needs to be corrected and recirculated to reflect the following information, and replaced with the following table.

Table 3.11-2
Project Consistency with Applicable 2020-2045 RTP/SCS Goals

Goal	Consistency Analysis
1. Encourage regional economic prosperity and global competitiveness	The proposed project is a 1.2 mile fixed route aerial transit system, which neither coordinates nor connects with the larger area transit network. Given its limited scale, it does not have the ability to encourage regional economic prosperity and global competitiveness. Furthermore, given its limited ridership and the fare structure represented to the media, the long-term viability of the Project is questionable. The Project is thus not consistent with this goal.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods	The proposed Project would provide limited additional mobility primarily to ticket holders of Dodger Stadium events by providing a fixed-route system. Greater flexibility can already be achieved in serving these users via the existing Dodger Stadium Shuttle. As designed, the Project competes for ridership at two of its three stations with the existing bus and light-rail transit system. There is nothing inherent in the Project that would improve overall transit system reliability or safety. The system is not specifically designed for goods movement. It is questionable whether the Project will result in any real or substantial reduction in passenger vehicle miles traveled and associated GHG emissions. The Project is thus not consistent with this goal.
3. Enhance the preservation, security, and resilience of the regional transportation system	The Project is a new privately constructed and operated fixed-route ART with limited projected ridership. Given the high cost of construction and operation, the limited projected ridership, and the fare structure which has been represented in the media, which would generate limited operational revenues, the long-term viability of the ART as a private project is questionable. There is the likelihood that a failing ART may be required to be taken over by Metro in the future, which would take resources away from the existing public transit system to support an expensive, 1.2-mile system with limited inter-system connectivity. The Project may therefore threaten the

Table 3.11-2
Project Consistency with Applicable 2020-2045 RTP/SCS Goals

Goal	Consistency Analysis
	preservation, security and resilience of the regional transportation system by drawing operating capital from the regional system. The Project is therefore not consistent with this goal.
4. Increase person and goods movement and travel choices within the transportation system	The Project would have limited ridership, which would mainly consist of Dodger Stadium ticket holders and tourists. Dodger Stadium ticket holders are currently served by a Metro-operated Shuttle from Union Station. Most other riders would be diverted from the existing transit system to experience the novelty of the ART. The Project is therefore not consistent with this goal.
5. Reduce greenhouse gas (GHG) emissions and improve air quality	Given the limited Project ridership and the fact that most of the riders would be diverted from other modes of transit, rather than from automobile use, and the Project's potential to induce additional tourist VMT as tourist commute via Uber or auto to access this ride, the reduction in GHG, if any, would be very limited. The Project is therefore not consistent with this goal.
6. Support healthy and equitable communities	The DEIR indicates the Project is consistent with this goal because the "proposed Project would support healthy and equitable communities by providing a potential mobility hub at the Dodger Stadium property, where passengers would be able to access a suite of first and last mile multimodal options, such as a bike share program to provide connectivity to Elysian Park and the surrounding communities, as well as a potential mobility hub at the Chinatown/State Park Station." However, the mobility hub is only a "potential" component of the Project, rather than a committed part of the Project. The Project sponsor can therefore not rely on the potential mobility hub as the basis for concluding consistency with this goal. The Project is therefore not consistent with this goal.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network	Given the limited, 1.2-mile length of the system, the fact that most of the riders are likely to have been diverted from other modes of transit, and the ability of Metro to convert the existing bus fleet to green energy over time, the Project's contribution to climate change response is highly questionable. The Project would result in the construction of a highly visible, fixed-route system, limiting the ability of the Project to adapt to a changing regional development pattern. Given the Project's lack of connectivity to existing transit modes, the Project works against an integrated transportation network. The Project is therefore inconsistent with this goal.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel	While the Project does represent the introduction of a new transportation technology to the region, it introduces a technology that is not easily or cheaply integrated with the existing transit system. The lack of integration with the existing transit system would force users whose trips are not limited to between Union Station, Chinatown and

Table 3.11-2 Project Consistency with Applicable 2020-2045 RTP/SCS Goals	
Goal	**Consistency Analysis**
	Dodger Stadium to have to transfer to other modes to complete their trips. This is not efficient. Furthermore, the 1 hour 12 minutes – 2 hour wait-times to board the system after Dodger Games is also not efficient. The Project is therefore not consistent with this goal.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options	As noted in the existing DEIR consistency analysis: "The proposed Project would encourage development of diverse housing types in areas that are supported by multiple transportation options by providing an additional transportation option for the residents and visitors in the City of Los Angeles, and enabling access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS." This is why the Project would be growth-inducing and the DEIR must analyze it as such.
10. Promote conservation of natural and agricultural lands and restoration of habitats	The DEIR states that: "The proposed Project would promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area, and would not impede the region's goal of conserving land and restoring habitats." Not destroying habitat is not the same as promoting the conservation of natural lands and habitats. The Project does nothing to further this goal.

Response P700-45 This comment provides a characterization of the proposed Project's policy consistency analysis contained in Section 3.11, Land Use and Planning, of the Draft EIR. As identified therein, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) which is provided in Table 3.11-2, on pages 3.11-45 and 3.11.46. The 2020-2045 RTP/SCS serves as a long--range regional transportation planning tool used to build upon and expand land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern.

As indicated in Table 3.11-2 of the Draft EIR, the proposed Project would be compatible with the goals of the 2020-2045 RTP/SCS. While some Goals are not applicable to individual transportation projects (such as Goals 1, 3, 6, 7, 9, and 10), nevertheless the proposed Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS. Specifically, consistent with Goal 2, the proposed Project would improve mobility, accessibility, reliability, and travel safety for people and goods by reducing passenger vehicle miles traveled and by providing a new mode of public transportation in the form of a high-capacity aerial rapid transit connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities. The proposed Project would also improve the Dodger Stadium visitor experience by providing efficient, high-capacity,

and faster alternative access to Dodger Stadium. Implementation of the proposed Project also would create both new and improved, existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, the Chinatown Metro L Line (Gold) Station, and several regional and local bus lines serving the Project Study Area. As discussed in Section 2.0, Project Description, and Topical Response C, Project Features, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses in surrounding communities while unifying and connecting communities through transit mobility access, consistent with Goals 7 and 8. Additionally, the proposed Project would reduce air quality emissions by reducing vehicle trips, as discussed in Section 3.03, Air Quality of the Draft EIR, consistent with Goals 5 and 6.

The comment mischaracterizes many aspects of the proposed Project and otherwise does not provide a basis for the speculative assertions provided. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation, consistent with Goal 7.

Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

With respect to the comments in Goal 3, refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond

financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles.

With respect to the comments in Goal 8, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

As discussed in Section 5.0, Corrections and Additions, of this Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Refer to Response P700-69 with regards to Goal 9 for a discussion of the potential growth-inducing impacts of the proposed Project.. Contrary to the assertion that the proposed Project would be inconsistent with Goal 10, the proposed Project is located in a developed and urbanized area, and would not impede the region's goal of conserving land and restoring habitats. Refer to Section 3.04 Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR, for a discussion of how the proposed Project would have less than significant impacts to biological resources with mitigation. This conclusion is further substantiated by Appendix G, Supplemental Biological Resources Report, of this Final EIR. As discussed in Appendix G, while the removal of the relatively small amount of wooded habitat for the proposed Project would result in a marginal reduction of suitable tree habitat in the short-term, in the long-term, the replacement of the trees proposed in connection with the applicable tree replacement requirements (and memorialized in BIO-PDF-F) would more than offset any realized impacts associated

with the proposed Project. In addition, in order to provide additional environmental benefits, the proposed Project would implement BIO-PDF-A through BIO-PDF-H. BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction that are not identified to be removed, but are either in the construction footprint, or in close proximity to the construction footprint, is discussed in Section 3.04 of the Draft EIR. BIO-PDF-B through BIO-PDF-H are discussed in Section 5.0, Corrections and Additions, of this Final EIR.

As such, the proposed Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS and impacts to consistency with this plan would be less than significant.

Comment P700-46 **C. Failure to Identify or Mitigate Inconsistency With the City of Los Angeles General and Specific Plans.**

As previously noted in this comment letter and on DEIR pages 2-61 to 2-62, the Project requires a Specific Plan, and "relief" from the River Implementation Overlay District and Cornfield Arroyo Specific Plan. That is because the Project is not consistent with the General Plan and zoning for the area, or with the associated implementing overlay and Specific Plan. These discretionary approvals represent unidentified mitigation for Project land use plan consistency impacts. These discretionary approvals are outside of the control of the Lead Agency. Absent a showing that the responsible agency is willing to implement these de facto mitigation measures, a finding of plan consistency is not supported by substantial evidence. The potential for Los Angeles City General Plan consistency impacts remains and must be so identified in the DEIR. In turn, those General Plan and Specific Plan discretionary approval requests must be the subject of their own full-fledged CEQA review.

Response P700-46 Refer to Response P700-13 for a discussion of how CEQA does not require the EIR to include a "showing" of responsible agency approval, and how a lead agency may presume that the responsible agency will act in accordance with its duties. The EIR is intended to provide environmental clearance for the discretionary entitlements, reviews, and approvals required for implementation of the proposed Project outlined in Section 2.10, Required Permits and Approvals, of the Draft EIR, inclusive of the approval of a Specific Plan by the City of Los Angeles. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with various land use planning documents, including the City of Los Angeles General Plan, City of Los Angeles Zoning Code, River Implementation Overlay District, and Cornfield Arroyo Specific Plan. As discussed in Section 3.11, the Project Sponsor is seeking to create a Specific Plan as part of the proposed Project to allow for the proposed Project to be fully consistent with the surrounding zoning and to otherwise provide for the consistent application of Project design standards, limitations and operational measures. Accordingly, with this approval, the proposed Project would not conflict with the applicable land use documents at the time of Project implementation, and the impact would be less than significant.

Comment P700-47 **XI. THE DEIR FURTHER VIOLATES CEQA DUE TO ITS INACCURATE AND FLAWED TRANSPORTATION ANALYSIS.**

The DEIR on page 1-5 claims that as "detailed in Table 3.17-6 of this Draft EIR, the proposed Project is forecast to reduce annual VMT by 2,434,000 in the Project's first operational year in 2026, increasing as ridership increases to an annual VMT reduction of 5,067,000 in 2042." However, the DEIR fails to show the analytic route by which this number was reached in any independently verifiable fashion. This forecast is based on a black-box calculation, not supported by substantial evidence or common sense.

A. Common Sense Explanation of Why The VMT Calculations Are Fatally Flawed.

CEQA Guidelines Section 15064.3(a) defines VMT as "**the amount and distance of automobile travel attributable to a project**". Guidelines Section 15064.3(b)(4) requires:

> (4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

The DEIR has failed to comply with this standard, both when it comes to the ridership estimates, and then when it comes to the VMT calculation. Table 3.17-4 from the DEIR, reproduced below, shows the Project's anticipated ridership. It should be noted that of these riders, many of the game ticket holders are likely already to be using Metro's free shuttle service from Union Station, or otherwise accessing the Stadium via transit. For these riders, there would be no VMT reduction, as diversion from the existing shuttle or existing transit does not count for purposes of calculating a VMT reduction. It should also be noted that Metro has the capacity to increase the number of shuttle buses to meet demand and the option to convert these buses to clean energy, which makes the usefulness and benefit of investment in the Project highly questionable.

Ridership projections

Table 3.17-4: Proposed Project Estimated Daily Riders

Ridership Market Segment	Daily Weekday Riders				Daily Weekend Riders					
	2026		2042		2026			2042		
	Low Day	High Day - Game	Low Day	High Day - Game	Low Day	High Day – LASHP	High Day - Game	Low Day	High Day – LASHP	High Day - Game
Dodger Stadium Access (Game/Stadium Event Ticket Holders)										
Alameda Station		5,100		8,500			5,100			8,500
Chinatown/State Park Station		900		1,500			900			1,500
Tourists	2,575	1,265	2,575	1,265	3,570	3,570	1,210	3,570	3,570	1,210
Dodger Employees	30	140	30	140	30	30	140	30	30	140
Other Special Events										
Special Events at LA State Historic Park						1,120			1,120	
Neighborhood Riders										
Alameda Station	400	400	500	500	200	200	200	250	250	250
Dodger Stadium Station	400	400	550	550	200	200	200	300	300	300
Chinatown/State Park Station (Neighborhood/Regional and Daily Park Access)	425	425	575	575	320	320	320	370	370	370
Total Daily Riders										
Total Daily Riders	3,830	8,630	4,230	13,030	4,320	5,440	8,070	4,520	5,640	12,270

Note: This table shows the number of daily riders. It is assumed that each rider will make two trips.
LASHP = Los Angeles State Historic Park.
Total ridership in the high game day scenario exceeds the 10,000 riders destined to the game since the Project will operate during the day before the game, including carrying employees and neighborhood riders.

There are only 81 Dodger home games in any given season.[20] As shown in Table 3.17-4, it is anticipated that 5,100 in 2026, rising to 8,500 persons in 2042 will access Dodger Stadium on game day via the Project from Union/Alameda Station. The DEIR needs to explain the basis for the assumed increase from 2026 to 2042, which it currently fails to do.

Currently Metro operates a free shuttle to Dodger Stadium from Union Station, the Dodger Stadium Express. According to Yelp reviewers, travel time for the Shuttle is 15-20 minutes. According to Metro: "In 2019 the Dodger Stadium Express transported 377,180 passengers, the largest number of passengers of any given year."[21] This equates to an average of 4,657 passengers from the Shuttle's two locations: Union Station and Harbor Gateway Transit Center.[22] According to DEIR page 2-10, the Dodger Stadium Express buses only carried approximately 1,850 riders on average per game; however, no source is given for this figure. Please provide a verifiable source.

This means that at least 1,850 of Project riders on game day are likely to be users diverted from the existing free bus Shuttle, and thus do not count as a reduction in VMT. The number of actual new and diverted game day riders will be a function of fare, which has not been disclosed in the DEIR. At maximum, 3,250 Project users in 2026, increasing to 6,650 users in 2042 would thus be ticket holders either diverted from other transit or newly using transit to access the Stadium on game day. Given the post-game loading time for the Project of up to approximately 1 hour 12 minutes in 2026 increasing to 2 hours in 2042 given projected ridership, it is unclear how many ticket holders will want to use this private gondola system, which requires access via Union Station, and which will likely charge a fare in order to maintain the system.[23]

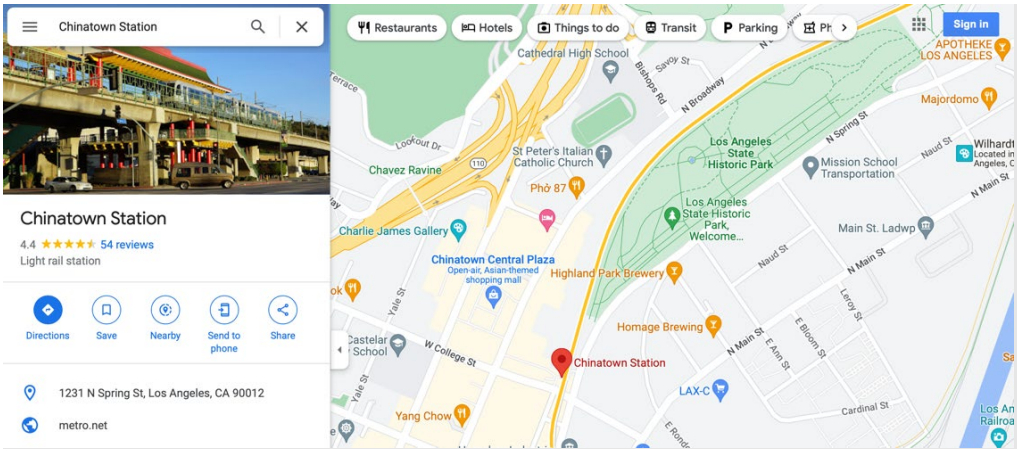
Should game day ticket holders choose to make use of the Project, it is unclear how much of a VMT reduction will actually occur, as it would depend on both how, and from how far away, users come to access the system.

In terms of VMT reduction, it does not appear appropriate to count tourist trips when calculating VMT reduction, as tourist trips are likely induced trips. In fact, the VMT calculation would need to account for how tourists access the system and whether the Project induces automobile trips as tourists take Uber or other vehicles to access one of the only three Project stations. The Project is thus likely to result in an increase in tourist-related VMT.

Commuters making use of the Project are likely to already be using public transit. Given that the Project only has three stations, and the location of those stations, it is unlikely that commuters will switch from bus or rail service to make use of the Project. Whether commuters switch to the Project would be a function of their ultimate destination, relative fare, relative wait time, relative walk time, relative travel time, relative transfer time, and relative numbers of transfers between trip ends. Regardless, commuters that switch from public transit to the Project also cannot be counted in the calculation of any Project-induced VMT reduction.

The DEIR fails to justify why neighborhood users would want to use the Project to access the Dodger Stadium station. There is currently no reason to access Dodger Stadium, other than to see a game. Do the ridership projections assume additional development at Dodger Station? (See piecemealing discussion above.) If so, this needs to be disclosed and analyzed in the DEIR. If not, any assumption of neighborhood users of the system is not supported by substantial evidence.

Instead, any neighborhood users would more likely make use of the system to go between the Chinatown Station and Union/Alameda Station, which each have trip attractors. However, there are already Metro stations at Chinatown and Union Station, as shown in this Figure, which also shows the proximity of the existing Metro Chinatown Station to the Los Angeles State Historic Park.



In making a trip between Chinatown and the Union Station area, potential riders would be deciding between the use of the Project system, existing Metro public transit, walking, or making the trip via automobile. Only trips diverted from automobile use, to Project use, would count towards a VMT reduction. Given that it is approximately 0.6 miles, or a 12-minute walk between the two existing stations according to Google Maps, and the Metro Gold Line already runs between the existing Metro Chinatown Station and Metro Union Station, use of the Project to travel between these two locations would be dependent on its relative cost, the minor difference in proximity to nearby uses between the Metro and Project systems, and the user's ultimate destination.

Users that don't have both an origin and destination at one of the Project stations would be more likely to continue to use other existing public transit, which would not require a transfer to reach, or fewer transfers to reach their destination. The likelihood that any riders would be diverted from automobile use, given the proximity of existing transit is unlikely. Therefore, VMT reductions would also be unlikely to result from the Project, from neighborhood users traveling between these two locations.

The VMT reduction claims in the DEIR are not supported by substantial evidence or common sense. It appears that the VMT reduction claims are grossly overstated and that there may in fact be a net increase in VMT due to induced tourist trips.

Footnote 20: https://www.truebluela.com/2022/12/6/23316048/dodger-stadium-gondola-project-studyfrank-mccourt

Footnote 21: https://www.metro.net/about/l-a-metros-dodger-stadium-express-to-provide-free-servicefrom-union-station-and-harbor-gateway-transit-center-to-dodger-stadium-for-all-2022-homegames/

Footnote 22: https://www.metro.net/about/l-a-metros-dodger-stadium-express-to-provide-free-servicefrom-union-station-and-harbor-gateway-transit-center-to-dodger-stadium-for-all-2022-homegames/

Footnote 23: If a fare is not being charged, the DEIR needs to explain how the system will be financially viable, so as to avoid physical impacts to the environment associated with a non-self-sustaining private transit system.

Response P700-47 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As noted on page 3.17-26 and 3.17-27, as a transit project, quantitative VMT estimates are not required under CEQA as detailed in both guidance published by the Governor's Office of Planning and Research (OPR), and the City of Los Angeles Transportation Assessment Guidelines (TAG). Accordingly, the proposed Project's VMT analysis was provided for informational purposes and to evaluate whether the proposed Project would result

in a VMT reduction benefit. The analysis of VMT for the proposed Project employed a variety of data, methodologies, and models in order to estimate Project ridership, vehicle trips reduced, vehicle trip lengths, and ultimately the VMT benefit of the proposed Project.

The comment quotes CEQA Guidelines Section 15064.3(b)(4), wherein (and as restated in the comment) it states that "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled …," "A lead agency may use models to estimate a project's vehicle miles traveled and may revise these estimates to reflect professional judgment based on substantial evidence," and "Any assumptions used to estimate vehicles miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project." This is what was done in the preparation of VMT estimates for the proposed Project.

The methodology for estimating the VMT for the proposed Project is outlined in pages 3.17-26 through 3.17-30 and pages 3.17-34 through 3.17-38 of the Draft EIR. Additional information and assumptions regarding the ridership forecasting that feeds into the VMT analysis can be found in Appendix N of the Draft EIR. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[15] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

The commentor states that many of the proposed Project riders would be existing Dodger Stadium Express riders or people taking transit to Dodger Stadium. While many Dodger Stadium Express riders may choose to ride the proposed Project to take advantage of the much quicker travel time and frequent service, the average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845[16]), so the majority of riders are expected to shift from other modes. The Dodger Stadium Express ridership statistics referred to by the commenter are inclusive of two-way travel (e.g., a passenger is counted once to the game and once after the game), whereas the referenced 2019 season average is to Dodger Stadium, as noted on page 3.17-27. Additionally, the Dodger Stadium Express operates during playoff games, so there were more than 81 days when the service operated, so the data referenced by the commenter aligns with the data used in the Draft EIR. In addition, while funding sources for Dodger Stadium Express are not known beyond

[15] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.
[16] Los Angeles Dodgers. 2019. Dodger Stadium Express Rider Counts.

the 2023 season, the proposed Project would not preclude the continued operation of the Dodger Stadium Express, which would provide further transit capacity to Dodger Stadium. Despite the slower travel time, some riders may prefer to continue riding the service, such as riders who have fear of heights.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Appendix N of the Draft EIR includes detailed information regarding the ridership estimates for the proposed Project. As described in Appendix N, proposed Project ridership is expected to increase between 2026 and 2042 due to increased cost of time and driving, increased congestion, and the planned expansion of the regional transit network, which will make regional transit travel time more competitive with driving. It is a typical process for proposed transit projects to include both an opening year and a horizon year analysis, consistent with Federal Transit Administration (FTA) requirements and typical practice for Metro project environmental documents. In these documents, the horizon year ridership estimates are usually higher than the project opening year, reflecting population and employment growth in the region. Population growth both increases demand for transit, as well as makes fixed guideway transit more travel time competitive to driving as regional congestion serves as a capacity limitation for vehicle travel. Horizon year ridership estimates also account for the further buildout of the funded regional transportation network including transit projects in the project development pipeline.

The commenter referenced Dodger Stadium Express travel time noted in Yelp reviews. As described in page 4-63 of the Draft EIR, Metro provided data from the 2019 season for the Dodger Stadium Express travel time. The pre-game travel time from Union Station to Dodger Stadium ranged from approximately 14 minutes to 24 minutes, and the post-game travel time from Dodger Stadium to Union Station ranged from approximately 18 minutes to 49 minutes. These travel times do not include bus loading time and queue time.

The proposed Project would be free to ride for anyone with a ticket to a Dodgers game, consistent with the existing Dodger Stadium Express service. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

The commentor correctly notes that the proposed Project's VMT reduction is based on the mode of access and the distance traveled of the Dodger game attendees. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit, parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data. Many of the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. As described on page 3.17-28 of the Draft EIR average trip length data for Dodger Stadium were obtained via location based mobile device data for the 2019 season, with over 2 million data samples.

The main VMT reduction benefit of the proposed Project would come from travelers shifting from driving to Dodger Stadium to taking transit. The VMT change associated with some riders who park and ride rather than park at Dodger Stadium are factored into the analysis, but are minor in their effect given the proximity of the Union Station and Chinatown areas to Dodger Stadium. Additionally, the VMT benefit associated with existing Dodger Stadium Express ridership are already accounted for in the calculations of existing Dodger Stadium VMT. The Draft EIR estimates the proposed Project's net benefit from existing conditions. The shift of riders from Dodger Stadium Express to the proposed Project would not result in a change in Dodger Stadium VMT, and the EIR accurately does not assign any VMT benefit associated with this potential shift from one mode of transit to another.

As detailed in Appendix N, Transportation Appendices of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles. The HR&A Analysis of Potential LA ART Tourist Ridership is included in Appendix N. As explained on page 3.17-36 of the Draft EIR, tourist trips were not included in the VMT reduction estimate. HR&A Advisors is a highly regarded economic consulting firm with the experience and technical capabilities to be an authority on estimating tourism market capture. Their conclusion was that it is unlikely that tourists would travel to Downtown Los Angeles solely to ride the proposed Project. In their expert opinion, the proposed Project is assumed to capture a share of the existing tourism market destined for Downtown Los Angeles as an additional attraction to enjoy while visiting other sites and attractions, and is not expected to result in an increase in overall regional tourism. Therefore, the VMT generated by the proposed Project tourism was expected to be negligible and therefore is not necessary to include in the VMT estimate.

There are several reasons why neighborhood transit users may ride proposed Project. The proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. The VMT reduction associated with neighborhood transit users was assumed to be minor and was not included in the VMT reduction estimate for the proposed Project.

As described on page 3.17-36 of the Draft EIR, the VMT reduction benefits associated with tourism ridership, Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not included in the VMT reduction estimate. Thus, the VMT reduction estimate would be considered conservative, as the proposed Project is likely to further reduce VMT beyond the level quantified in the EIR, not grossly overstated as suggested by the commentor.

Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly segmented or "piecemealed" from a larger development project at the Dodger Stadium property.

Comment P700-48 It also appears that the likely VMT reductions resulting from the Project are not enough to qualify the Project as an Environmental Leadership Transit Project (ELTP), and objection is also made to the characterization and special treatment of the Project as an ELTP. Given the likely significant overstatement of Project-induced VMT reductions, Greenhouse Gas (GHG) reduction estimates are also likely significantly overstated.[24] Furthermore, given the lack of a financial operating plan and representations that fares for ticket holders will be free, as discussed elsewhere in this comment letter, it is highly questionable whether the useful life of the system will extend to 2056, the year used to justify the Project's compliance with Pub. Res. Code Section 21168.6.9 as discussed on pages 1-4 to 1-9 of the DEIR. More likely the Project will become financially unsustainable long before then. Furthermore, as noted elsewhere in this comment letter, the Project is not included in the current RTP/SCS project list, and thus the Project is not consistent with the RTP

or many of its goals. Substantial evidence does not support the assertion that the Project as an ELTP. Both the VMT calculations and the GHG calculations in the EIR need to be redone in a recirculated DEIR to more accurately reflect the likely reality of Project use behavior, and must be supported by verifiable substantial evidence.

Footnote 24: Although the Project sponsor claims the Project will have zero emissions, and will make use of Green Power, the Project does not include a mitigation measure to that effect or any other legally binding method for ensuring the Project will use 100 percent Green Power over the entire life of the Project. In the absence of legally enforceable guarantees, GHG emissions reduction figures are likely further overstated.

Response P700-48 Refer to Section 1.0, Introduction, Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. Refer to Appendix R, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Draft EIR, and Appendix E, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Final EIR. Refer to Topical Response A, SB 44, for discussion of how the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gas emissions directly in the Project's corridor as defined within the EIR over its useful life, and without using offsets. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO2e. Tthe proposed Project's lifetime VMT reduction over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under SB 44. Refer to Section 1.0, Introduction, of the Draft EIR, pages 1-6 to 1-8, and Appendix N, Transportation Appendices, of the Draft EIR, for analysis of the proposed Project's consistency with each of the goals of the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), or "Connect SoCal." The proposed Project is consistent with RTP/SCS, as the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people **traveling** in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities, and would otherwise reduce greenhouse gas emissions by reducing VMT. Further, the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment to further demonstrate the proposed Project's leadership towards sustainable transportation.

In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, in this Final EIR. As discussed in Section 5.0, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-49 **B. Further Objections to the DEIR's VMT and GHG Reduction Claims, As Well As Its Failure To Address Caltrans Encroachment Requirements.**

As described in DEIR Appendix N, due to the unique nature of the proposed Gondola Project, both the Metro ridership forecasting model and the City of Los Angeles travel demand model were inadequate to estimate ridership to Dodger Stadium because they are "regular weekday employment" models that exclude "special generators" like Dodger Stadium.

To attempt to remedy the inadequate forecasting and travel demand models, a consultant developed a "regression-based game-day ridership model" to estimate ridership to Dodger Stadium via the proposed Gondola Project. This Ridership Model is inadequate because it fails to validate and calibrate its data (highway speeds, travel times, and Gondola ridership) to ground truth.

Response P700-49 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As described in Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR, given the uniqueness of a gondola as a mode of transportation, a model specifically tailored to the events at Dodger Stadium was developed to estimate ridership of proposed Project. The ridership model is based on the statistical relationship between cost and travel time, using data from mode choice intercept surveys, transit access for a similar venue, and intercept survey of Dodger Stadium Express riders.

The ridership model was validated to Dodger Stadium mode of access data and Dodger Stadium Express average ridership, as detailed on page 9 of the Appendix N, Ridership Model Development memorandum.

Caltrans' Performance Measurement System (PeMS) data were analyzed to validate year over year changes to vehicular travel speeds to inform projection of future congestion factors, as described in Appendix N of the Draft EIR. However, PeMS data do not provide the full picture of travel time for trips to/from Dodger Stadium, as they only provide average freeway speed and volume data at the monitoring locations. To assess the full travel time (not just snapshot freeway speeds), the proposed Project's model includes travel time data for the entire length of trips to/from the origin/ destination zip codes and Dodger Stadium as well as to/from the origin/destination zip codes and the Union Station area using ESRI's routable network data were used to calculate travel time from each zip code contained within the Dodgers ticket sales database provided for the analysis to the Union Station area, as well as to Dodger Stadium. An ESRI network dataset was created using Open Street Map (OSM) data as the base. OSM is an open-source data source that includes information such as roadway classification, speed limit, number of lanes, restricted access, and levels of congestion, which were used to calculate congested and non–congested existing travel times. Using this data, ESRI's network analyst tool estimated travel times, which included not only the freeway segments, but the complete length of the trip between the origin and destination zip code centroids.

Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[17] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P700-50 **1. Lack of Baseline Data Renders The DEIR Invalid.**

Per LADOT's 2022 Transportation Assessment Guidelines, Page 2-21, "Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used."

Appendix N - Transportation in the DEIR states: "Sampled speed data were not available for the SR-110 adjacent to Dodger Stadium." Yet Appendix N, Page 10, concludes: "The ridership model includes an assumed 10% increase in travel time for

[17] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

2026, and a 25% increase in travel time for 2042 conditions relative to 2019 conditions. Based on the freeway speed trends, assuming trends hold, these assumptions are reasonable."

To decide whether a given project's environmental effects are likely to be significant, an agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the baseline for environmental analysis. The baseline normally consists of the physical environmental conditions in the vicinity of the project, as they exist at the time environmental analysis is commenced. Guidelines § 15125; North County Advocates v. City of Carlsbad (2015) 241 Cal.App.4th 94, 96.

Here, the DEIR fails as an informational document because there is no baseline travel time speeds provided for the Project vicinity because there is no PeMS speed data available (or obtained and then provided to the public as part of the DEIR) for SR-110 near Dodger Stadium. As such, the base year travel time speeds cannot be validated, making any assumptions for future travel times conjectural and flawed. The DEIR could easily and should have validated travel time speeds near Dodger Stadium to ensure reasonable model calibration. The DEIR should be recirculated to include this foundational baseline information.

Response P700-50 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Response P700-49 and page 4 of the Ridership Model Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR for a discussion of how ESRI's routable network was used to calculate travel time from each zip code contained within the Dodgers ticket sales database. PeMS data cannot be used for the purpose of calculating travel time for the full length of a trip, as PeMS provides travel speed and volume data only on freeway segments where Caltrans has monitoring loops. These speed data represent a snapshot in time at a particular location, not the full travel time from origin to destination. As noted on page 10 of the Appendix N, Ridership Model Development memorandum, PeMS data were available and used in the analysis on the I-5, US-101, I-110, I-10 and SR-60 freeways, which are all used in regional access to Dodger Stadium. The PeMS data detailed in Appendix N represent the best available data on freeways adjacent to Dodger Stadium. While the PeMS data were not available for the SR-110 freeway to use in the analysis, the data available through the PeMS system for all of the other freeway facilities noted above are more than adequate to estimate year over year trends in the decline in travel speeds on regional facilities to inform the future congestion factor used in the ridership model. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-51 **2. The DEIR's Transit Mode of Access Analysis is Flawed.**

Similarly, the Gondola Project transit access model analysis of proposed ridership is flawed for lack of validation and calibration. Appendix N, Page 8, states: "The existing model was then calibrated to existing conditions for the share of Dodger Stadium Express (DSE) riders that take transit to LA Union Station based on data prepared by Metro in reports to the South Coast Air Quality Management District (SCAQMD) for the 2011-2015 Dodger seasons."

Additionally, the transit access model utilized 2014 Dodger Stadium Express intercept survey data to calculate mode of access to Dodger Stadium. The consultants used the same percentages as 2014, which "indicated that 88% of riders arrived via transit, walking, or biking."

Again, these data have not been validated, but are used to calibrate the transit access model. However, 2014 survey data are not an adequate representation of existing mode access to support future forecasts of the proposed Gondola Project's ridership, which makes future access mode data flawed. The DEIR could and should have validated mode access data to existing conditions to ensure reasonable model calibration. The DEIR should be recirculated to include this foundational information.

Response P700-51 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As noted in Appendix N, the mode of access model was based on the 2014 Dodger Stadium Express intercept survey data because it offered a substantially higher number of samples compared with the data from other Metro reports to SCAQMD, and represented one of the more conservative (e.g., higher auto mode of access) data of the intercept surveys. The mode of access data used in the forecast were 71% transit and 3% walk/bike. This non-auto mode of access data from the intercept survey and the data from the 2011-2015 SCAQMD reports are within the same range from 74% to 91.4%, which suggests that the 2014 data is reasonable to incorporate as an assumption in the mode of access model. Additionally, as further detailed in Response P700-52, an additional 20% of ridership beyond the model estimates was assumed to capture the riders expected to ride the proposed Project based on its unique customer experience. These riders were assumed to have a 35% non-auto mode of access. Combining these mode of access assumptions in proportion to the estimated ridership results in a total non-auto mode of access for the proposed Project of 67.5%, as detailed in Appendix N.

Additionally, for a more conservative analysis, the decision was made to hold the mode of access data obtained from intercept surveys in 2014 and not further adjust mode of access nor to take data that indicate a higher transit mode of access on Dodger Stadium Express, even though the regional transit network provides

substantially more high-quality transit service than was available to Dodger Stadium Express riders in 2014.

The quote from Appendix N in the comment states that the model was calibrated to existing conditions of the Dodger Stadium Express, so it is unclear why the commenter is also stating that the analysis is flawed due to a lack of calibration and validation.

Comment P700-52 **3. The "Customer Experience" Factor is Flawed.**

Appendix N, Page 12, states: "There is no available data source to quantitatively estimate how this user experience alone will impact ridership, but it is believed that actual ridership could ultimately exceed the model estimates due to the unique experience of the system. An assumed factor of 20% was applied on top of the model estimates to reflect this potential to capture riders associated with the proposed Project's customer experience."

Nonetheless, the consultant "assumed mode of access for these riders is 65% vehicle mode of access, and 35% transit/walk/bike." Here, there is no dispute these data are not validated or calibrated because the document explicitly states there is no data available, but adds "assumed" factors without any surveys or other data collection. Thus, any VMT or GHG reduction benefits should not be included in the DEIR. The DEIR should be recirculated to remove any alleged VMT or GHG reduction benefits based on this "customer experience factor."

Response P700-52 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. The 20% customer experience factor was based on the professional judgment of the preparers of the ridership forecast. As the proposed Project would be a unique transportation option in Los Angeles County, it is reasonable to assume that some riders would choose to ride the system for more than just the travel time and travel cost savings. As stated in Appendix N, and detailed in the Response P700-51, the mode of access of choice riders was conservatively assumed to be 35% non-vehicle mode of access, and 65% vehicle mode of access to account for the likelihood of choice riders to prefer driving overtaking transit to connect to the proposed Project. Reflecting the full mode of access for the proposed Project, including these choice riders, the mode of access is 67.5% non-vehicle, and 32.5% vehicle mode of access, substantially lower than any of the existing mode of access data for Dodger Stadium Express. While vehicle access and parking are not required to be analyzed under CEQA, and while it is unlikely that vehicle mode of access would be this high for this rider segment, this conservative vehicle mode of access was used to ensure that the evaluation of vehicle and parking access and its potential to affect intersection operations are evaluated in a worst-case manner in the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and

Appendix N, Transportation Appendices of the Draft EIR.[18] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 3.17, the Draft EIR estimates that 6,000 game or event attendees would ride the proposed Project to a game or event in Dodger Stadium in 2026. This total includes those who would access the proposed Project via bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the Draft EIR estimates that 4,050 of the 6,000 riders in 2026 would arrive via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N of the Draft EIR.[19] These ridership estimates are inclusive of the customer experience factor. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment P700-53 **4. The Los Angeles State Historic Park Rider Estimate Methodology Is Questionable.**

As above, "No data are available for mode share of attendees travelling to events at the Park." But in this instance the consultants do not make any "assumed" factors, but do acknowledge, "because quantitative data to further refine this estimate was not readily available, Fehr & Peers conservatively did not include in the Transportation Section of this EIR the VMT reduction benefit of the proposed Project for this ridership market segment." Please confirm no VMT or GHG reduction benefits are attributed based on mode share of attendees to the State Historic Park.

Response P700-53 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. No VMT or GHG reduction benefits were attributed based on mode share of attendees to the Los Angeles State Historic Park as quoted in the comment and as stated on page 3.17-36 in Section 3.17, Transportation, of the Draft EIR. When events occur at the Los Angeles State Historic Park, the Metro L Line (Gold) is used by attendees, and as detailed in Appendix N, the Los Angele State Historic Park hosts major events, with substantial attendance. While no existing mode choice data are available for attendees, the proposed Project would provide substantial additional transit capacity to the Los Angeles State Historic Park that would augment the capacity provided by the Metro L Line (Gold), which can further to increase the number of event attendees who can transit compared with existing conditions. However, even though Los Angeles State Historic Park ridership is projected to occur on the proposed Project, no VMT or GHG

[18] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

[19] The UCLA Mobility Lab Study says that the proposed Project estimated this number to be 4,350. This is not accurate. As discussed in the text, this number is estimated to be 4,050.

reduction benefit were attributed to this market segment to ensure a conservative assessment.

Comment P700-54 **5. The Vehicle Miles Traveled (VMT) Analysis Is Further Flawed.**

The DEIR at 3.17-26 states: "the proposed Project would not increase vehicle capacity as it is a mode of transit. The proposed Project, as detailed in this section, would reduce VMT. Thus, no VMT analysis is required, and the associated impact is therefore less than significant." However, the Project sponsor is LA Aerial Rapid Transit Technologies, LLC (page 1-1), not a public transit agency. Furthermore, "gondolas" are not a mode listed as exempt under SB 743.

This is confirmed on page 3.17-27. "Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects." Thus, it is not demonstrated that the Project is exempt from a VMT, in light of the fact that "gondolas" are not mentioned.

As a matter of precaution, the Project applicants point out that "while not required, the VMT reduction benefit of the proposed Project was quantified for informational purposes." Interestingly, the purported VMT reduction benefits rely exclusively on Dodger games, which equate to eighty-one (81) regular season games, which is only twenty-two percent (22%) of the days of the year.

As detailed above, because the Gondola's Ridership Model is flawed by not being appropriately validated and calibrated, the Estimated Daily VMT – with Proposed Project (Table 3.17-5) numbers are inaccurate. This is further supported by the October 24, 2022 UCLA Mobility Lab Study (https://uploadsssl.webflow.com/61c3996ce146bfa8fc27adeb/635c2657c071e02577a5c5a0_Report%20on%20UCLA%20study%20of%20gondola%20traffic%20impact%20102522%20.pdf)

which concluded:

> "Promoters of the gondola claim that it will take 3,000 polluting cars off neighborhood streets and the 110 freeway before and after Dodger games, leading to a net reduction in greenhouse gas emissions. Transportation researchers from the University of California, Los Angeles (UCLA) examined these claims using a state-of-the-art transportation simulation model and found that the gondola could reduce traffic on major roads around Dodger Stadium on the night of a sold-out game, but the impact would likely be very limited. They found that the gondola likely would take only around 608 cars off the road. The gondola is thus unlikely to significantly reduce greenhouse gas emissions and traffic overall."

Therefore, the DEIR's analysis of the project's environmental impacts are inadequate. The Gondola's Ridership Model must be validated and calibrated to ensure accurate VMT and GHG results.

Response P700-54 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. As noted on page 3.17-26 and 3.17-27, as a transit project, quantitative VMT estimates are not required under CEQA as detailed in both guidance published by the Governor's Office of Planning and Research (OPR), and the City of Los Angeles Transportation Assessment Guidelines (TAG). Nevertheless, Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR included a VMT analysis of the proposed Project, which was provided for informational purposes. The Project Sponsor does not change the fact that the proposed Project is a zero-emissions fixed guideway high frequency transit project that could carry up to 5,000 passengers per hour per direction and would not be reliant on automobiles thereby reducing VMT. Nothing in SB 743, or the guidelines for its implementation, suggest that a transit project must be sponsored by a public agency for the exemption to apply. Nor do they indicate that the transit exemption only applies to specific types of transit projects. As discussed on page 3.17-27, in Section 3.17, Transportation, of the Draft EIR, the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* indicates that, in general, transit and active transportation projects reduce VMT and therefore are presumed to cause a less than significant impact on transportation. As further described on page 23 of the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the transit exemption aligns with the statutory goals contained in SB 743 by reducing GHG emissions, increasing multi-modal transportation networks, and facilitating mixed use development. The proposed Project is a transit project and like the examples named in the technical advisory, would align with SB 743's goals. As discussed in Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, the proposed Project has the potential to reduce GHG emissions and would increase multi-modal access to and from stations with pedestrian network improvements and would improve the bike circulation system by carrying cyclists over key barriers. While comparable aerial transit systems are operated in cities around the world, it is not such a common form of public transit that the Governor's Office of Planning and Research and the Los Angeles Department of Transportation would have specified it by name in their VMT screening criteria. But this does not change the fact that the proposed Project is a transit project and therefore is presumed to cause a less than significant impact on transportation under SB 743.

The VMT analysis was conducted for both daily (daily weekday and daily weekend) VMT and annual VMT, as shown in Tables 3.17-4 and 3.17-5 of the Draft EIR,

respectively. The annual VMT represents the VMT reduction benefit across a whole year, associated with Dodger Game Days. As described in pages 3.17-34 through 3.17-36 of the Draft EIR, the tourism ridership, the Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not quantified in the annual VMT reduction calculation in order to ensure a conservative analysis. Additionally, the model inputs and assumptions that were used to estimate ridership for games and events at Dodger Stadium were conservative as well. Including the additional market segments that were not included in the quantitative VMT analysis users in the annual VMT analysis would have resulted in a greater VMT reduction than reported in the Draft EIR.

The Draft EIR does note state or include analysis resulting in 3,000 cars would be removed from the streets. The Draft EIR does not analyze cars removed as it is not a transportation-related metric under CEQA Appendix G or under the City of Los Angeles Transportation Assessment Guidelines.

Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

The ridership model, assumptions, and estimates in the Draft EIR were prepared by constructing a detailed model utilizing accepted and tested data from both regional and local (City of Los Angeles) modeling, as well as was peer reviewed by a respected international consulting firm and found to be appropriate and reasonable. Any differences between the findings in the Mobility Lab Study and the Draft EIR are therefore to be expected and are explainable. Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or inappropriate for use.

Comment P700-55 6. The DEIR's Greenhouse Gas (GHG) Conclusions Are Invalid.

Analysis of GHG emissions is essential under CEQA. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. The DEIR concludes that the Project would result in less-than-significant

impacts related to GHG emissions. However, as detailed above, the DEIR presents an incomplete analysis of the Project, which results in a flawed GHG analysis.

Appendix N-6, provides: "4.13 Parking and Land Use Management: This policy states that excessive parking can incentivize undesirable behavior or result in large areas of vacant land that make it harder to reach destinations without a vehicle. The Project will not provide any dedicated vehicle parking. The proposed Project would utilize existing off-street parking facilities with available capacity as identified in a future parking management plan, which would also identify strategies for the City of Los Angeles to implement to minimize riders of the proposed Project parking in undesirable locations."

Since there is parking near the Gondola stop at Union Station, the Project does not provide any additional parking. Yet it is presumed that Gondola riders will use the over 10,000 spaces in publicly available lots and garages and in on-street spaces in order to be able to ride the Gondola. The environmental analysis is silent as to the incentivizing of people to drive to the Gondola to avoid parking at Dodger Stadium, which would increase VMT and GHG emissions.

The DEIR's traffic and GHG analyses are flawed on multiple grounds, including lack of substantial (or any) evidence to support various critical assumptions and conclusions. The DEIR should be corrected and recirculated to address each of these flaws and omissions.

Response P700-55 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to Dodger Stadium on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project ovr its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would

result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer also to the proposed Project's Preliminary Parking Management Implementation Plan.[20] As noted on page 12 and 13 of the Ridership Model Development Memo, in Appendix N, Transportation Appendices, of the Draft EIR, parking costs are key data elements that are used in the ridership model. The likelihood of an individual to ride transit is a balance of the overall travel time compared with driving and the overall travel cost of driving. The presence of over 10,000 parking spaces in the areas around the Alameda Station and Chinatown/State Park Station exists today. If the majority of Dodger Stadium attendees were looking to avoid paying to park at Dodger Stadium, they would have that option today. Also, as detailed on page 28 of the Appendix N PDF, in the table entitled *LA ART MODE OF ACCESS DATA CONSIDERED AND ESTIMATED FUTURE MODE OF ACCESS*, only 8.6% to 26% of Dodger Stadium Express riders take a vehicle (park and ride or TNC) to access the Dodger Stadium Express. In contrast, for a conservative analysis of parking demand, 27.6% of riders are estimated to park and ride. For most game attendees, the potential to save money on parking costs by taking the proposed Project is not enough of an incentive to make a change to their mode of travel such that a massive redistribution of parking locations suggested by the commenter would occur. It should be noted that Dodger Stadium has thousands of parking spaces, which will always be the closest parking locations to the Stadium, which are already considered in the existing environmental setting.

As discussed in Appendix N, the proposed Project's ridership model considered mode of access in its transit access model, analyzing proposed Project ridership that would come from riders parking within a ½-mile walking distance of either station, or from vehicle drop-offs at either station from a service such as Uber or Lyft. The model also takes into account parking, analyzing proposed Project ridership that would come from riders parking at Union Station, or other parking locations in Downtown Los Angeles, or from vehicle drop-off at Union Station, such as Uber or Lyft. This ridership model was used to calculate total VMT for the proposed Project. In turn, Section 4.4.5 of Appendix J, Greenhouse Gas Emissions Technical Report, recognized that GHG emissions associated with total VMT were calculated using the annual VMT as provided by Fehr & Peers, the authors of Appendix N. As such, the GHG analysis for

[20] Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

mobile source emissions inherently considered the potential for riders to park elsewhere in Downtown Los Angeles and ride the gondola to Dodger Stadium.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-56 **7. Ridership Queueing After Dodger Games Is Inadequately Analyzed.**

Appendix N, Page 20, indicates: "It is estimated that 6,000 game attendees (12,000 trips for round-trip) would ride the proposed Project in 2026 and 10,000 game attendees (20,000 trips for round-trip) would ride the proposed Project in 2042 per game, reaching the estimated capacity of the system."

Additionally, "the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The cabins would move at a maximum speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins." (DEIR, Page 2-42)

Based on this information, it can be estimated that a cabin on the Gondola cable every 200 ft,[25] travelling a speed of 13.4 mph would have the following queuing time:

a) 6,000 game day riders in 2026 (1hr 12 minutes)

b) 10,000 game day riders in 2042 (2 hours)

The DEIR does not address the post-game queueing for Gondola rides. Waiting one hour and twelve minutes (2026) to catch a Gondola ride after a night Dodger game is unrealistic. Waiting two hours (2042) to get on the Gondola is even more unrealistic. As such, it is disingenuous to state any VMT or GHG benefits from increasing ridership because those numbers are not realistic or justified. Please confirm no VMT or GHG reduction benefits are attributed based on inflated and erroneous ridership postgame numbers.

Footnote 25: It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand. (DEIR Page 2-42.)

Response P700-56 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at

the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds, in contrast to the existing Dodger Stadium Express, which has much longer gaps in bus departures (from 3 to 19 minutes spacing between bus departures based on 2023 season observations further described below). The comment incorrectly uses "queue" to refer to the total service time needed to transport riders from Dodger Stadium post-game. Actual riders would be waiting in the queue for shorter time periods.

In order to quantify the existing service time needed to transport Dodger Stadium Express riders, four post-game time periods were observed during the 2023 season. These games were selected to reflect the mix of game times, days and opponents. As noted below, the service time from the first bus departure to the last bus departure was nearly 2 hours, with the last bus departing up to 90 minutes after the end of the game. The amount of time between the end of each game and the departure of the last bus varied, with the June 15th and June 16th games both going into extra innings. Additionally, the June 16 game had a post-game drone show. While the Dodger Stadium Express has the capacity to carry approximately 1/5th of the riders of the proposed Project, its service time needed to load all riders is equivalent to that of the proposed Project in 2042, and longer than the needed service time for the proposed Project's 2026 opening year ridership estimate.

- Sunday, June 4, 2023 (Yankees)—1 hour 50-minute service time; 1 hour 30 minutes post-game
- Thursday June 15, 2023 (White Sox) —1 hour 54-minute service time; 49 minutes post game (game ended in 11th inning)
- Friday, June 16, 2023 (Giants) —2-hour 27-minute service time; 52 minutes post game (game ended in 11th inning)
- Saturday, June 24, 2023 (Astros) —1 hour 15 minutes service time; 1 hour 15 minutes post-game

These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service.

Topical Response B also discusses that passengers of the proposed Project may prefer to leave Dodger Stadium in other modes, such as the Dodger Stadium Express, rideshare, or even walking, due to the queues to board the proposed Project. Based on 2019 season data, there is an approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game. The proposed Project model assumed this same reduction for the post-game ridership

estimates for the proposed Project. To be conservative, the full reduction of post-game ridership is assumed to shift to TNCs, which are estimated to generate more VMT than private vehicle trips due to the VMT generated by the driver traveling to the pick-up location at Dodger Stadium. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel.

Comment P700-57 **8. The DEIR Is Flawed And Incomplete For Failing To Disclose And Address Caltrans Encroachment Permit Issues and Requirements.**

The DEIR is silent and ignores any direct or indirect impacts (visual, safety, traffic, construction traffic management, etc.) from Gondolas crossing over SR-110 near Dodger Stadium. As a result, the DEIR also ignores disclosing and analyzing any potential mitigation measures that must be implemented. This crucial final segment of the proposed Gondola system connecting to Dodger Stadium must be analyzed and evaluated for impacts. The DEIR seems to assume that Caltrans will simply provide an encroachment.

In general, Caltrans must identify and keep the highways free of encroachments. Jamison v. Dept. of Transportation (2016) 4 Cal.App.5th 356, 363. An "encroachment" includes "any tower, pole, pole line . . . or any structure . . . which is in, under, or over any portion of the highway." (Sts. & Hy. Code § 660.) The California Legislature has determined that Caltrans' obligations to care for and protect the state highways "shall apply to all private corporations authorized by law to establish or maintain any works or facilities in, under or over any public highway." (Sts. & Hy. Code § 661.)

Any encroachment permits issued by Caltrans "may provide such other conditions as to the location and the manner in which the work is to be done as the department finds necessary for the protection of the highway." (Sts. & Hy. Code § 672; see also La Canada Flintridge Dev. Corp. v. Dept. of Transportation (1985) 166 Cal.App.3d 206, 213-215.)

It simply is not adequate for the DEIR to defer consideration of potential impacts to the state highway and its traveling public for consideration at the traffic encroachment stage because "Caltrans requires that an approved environmental document accompany the 'Standard Encroachment Permit Application' (form TR-0100). All required documentation, including environmental, must accompany the encroachment permit application before Caltrans deems the application complete." (Caltrans 2018 Encroachment Permits Manual, Pages 4-1 and 4-2; https://dot.ca.gov/programs/traffic-operations/ep/ep-manual)

Additionally, "No new information can be required from an applicant once the application form with its accompanying documentation has been accepted as complete. However, the applicant can be asked to clarify, correct, or otherwise supplement the information submitted." (Id.)

Therefore, the DEIR does not address potential impacts, nor mitigation, within Caltrans' right-of-way with regard to the Gondolas traveling over SR-110. Evaluating potential impacts and mitigation after completion of the DEIR is inadequate and a failure to proceed in the manner required by law. The DEIR should be corrected and recirculated to address each of these flaws and omissions.

Response P700-57 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 2.10, Required Permits and Approvals, of the Draft EIR, listing approvals from Caltrans through an encroachment permit and/or other agreement, form of permission, or approval(s) to access, construct, and/or operate the proposed Project within or over the State transportation system right-of-way, including the SR-110. The EIR is intended to provide the environmental clearance for this approval, and analyzed the construction and operational impacts of the proposed Project crossing the SR-110. For example, Section 3.01, Aesthetics, of the Draft EIR, analyzed views from the SR-110, noting that "cables and cabins" would "be visible to motorists" on the SR-110, but "would not damage any scenic resources." The necessary applications will submitted at the time the proposed Project is before Caltrans for consideration of the applicable discretionary approvals required for implementation of the proposed Project. It is premature to provide such applications prior to the lead agency's certification of the proposed Project's EIR. Consistent with CEQA Guidelines Section 15096(a) and Public Resources Code sections 21104, 21153(c), and 21069, Caltrans, as a responsible agency, will rely on the information in the EIR to consider the aspects of the proposed Project within its jurisdiction. Pursuant to its role as a responsible agency under Public Resources Code Section 21153(c), Caltrans submitted a comment letter on the Draft EIR explicitly stating that "reviews, approvals, and encroachment permits will be conducted at the time of permit application so that all concerns can be adequately addressed."

Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of Metro's consultation with CEQA responsible agencies.

Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, and Caltrans has engaged in this

consultation process to ensure that the EIR included the information necessary for Caltrans to consider the aspects of the proposed Project within its jurisdiction. Because the EIR need not provide the encroachment permit application at this juncture, this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-58 **C. The DEIR Does Not Evaluate or Specifically Mitigate the Impact of Project Construction on Biking.**

There is one impact that the DEIR has treated only nominally. Guidelines Section 15064.3(a) provides that "[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. However, it also provides that "[o]ther relevant considerations may include the effects of the project on transit and non-motorized travel." (Emphasis added.) The most common forms of non-motorized travel are walking and biking. Here, the DEIR does not analyze or effectively mitigate the potential impacts of construction of the Gondola Project on the proposed Esplanade bike path that is planned as part of Metro's LAUS Forecourt and Esplanade Improvements. (DEIR, p. 3.9-32.)

The DEIR identifies the points during construction when the Esplanade bike path would be closed (DEIR, pp. 3.17-35 to 3.17-36 [30 weeks full and partial closures]), and other points when bicycle traffic would be "controlled." (DEIR, p. 3.9-33, 3.11-24, 3.17-46.) No description of the nature or level of "control" is given. There is no analysis of the impact on use of the bike path during these closures and "control" periods, and no mitigation is offered except for bikers to use a pedestrian detour (DEIR, p. 3.9-36), which has a potential impact on safety to both. The DEIR should be recirculated to provide a full analysis of the effects of Project construction on bicycle transportation, especially on the planned Esplanade bike path.

Response P700-58 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of how Alameda Station is compatible with Metro's plans at LAUS, including the planned LAUS Forecourt and Esplanade Improvements Project. Refer to Section 3.17, Transportation and Appendix B, Construction Assumptions, of the Draft EIR for details regarding pedestrian and bicycle detours during construction. "Control" means that flag people would hold pedestrians and bicyclists on the Esplanade bike path during temporary movements, such as crane movements. Pedestrian and bicycle traffic control would depend on the specific detours determined in the proposed Project's Construction Traffic Management Plan (CTMP) required by Mitigation Measure TRA-B, and which is subject to review and approval by the Los Angeles Department of Transportation. With implementation of Mitigation Measure TRA-B, impacts would be less than significant. Further, pedestrian and bicycle access will largely be maintained, or otherwise be slightly detoured, during certain phases of construction, as discussed in Section 3.17 of the Draft EIR.

Providing for both pedestrians and bicycles on the same detour is appropriate as both would be accommodated on the shared Union Station Esplanade, and bicycles may legally be ridden on sidewalks on the City of Los Angeles. Appropriate signage would be displayed, which will be outlined in the CTMP. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-59 **D. Mitigation for the Significant Hazard of Drivers Striking Pedestrians Because Project Features Obscure Their View Is Ineffective, Lacks Performance Standards, and Places Responsibility for Mitigation on Drivers, Not the Project.**

Because the stations and hugely tall towers require so much ground space for their foundations and structures, the proposed Project will create visual blockages that prevent drivers of cars and trucks from seeing pedestrians at various points. Among these points of blocked visibility are the Alameda Tower and the Chinatown/State Historic Park Station. (DEIR, p. ES-72.)

The DEIR proposes mitigation for this significant impact, denominating such mitigation as "visibility enhancement . . . sufficient to alert drivers to the presence of pedestrians." (Id.) The DEIR makes it plain that the size and location of the stations themselves will not be changed to protect pedestrians, but that mitigation will be provided to help drivers become aware of pedestrians, with the responsibility for avoiding the pedestrians then resting upon the drivers. The existing roadways and traffic flow, we are told, must adapt to ensure that Gondola construction and operation do not cause pedestrian injuries or fatalities, rather than the size or location of Gondola facilities adapting.

The DEIR proposes Mitigation Measure TRA A to carry out this "visibility enhancement." (DEIR, p. 3.17-67.) As previously noted, this mitigation measures is an example of improper deferral of mitigation. Like the mitigation discussed above, this measure does not meet the requirements of Guidelines Section 15126.4(a)(1)(B), in that it is deferred without Metro specifying definite performance standards, and Guidelines Section 15126(a)(2), in that no specific measure is "fully enforceable through permit conditions, agreements, or other legally binding instruments." Instead, the DEIR provides a laundry list of possible visibility enhancements, including "high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing." (DEIR, p. 3.17-67.) However, no performance standards for TRA A are given other than approval by the City of Los Angeles Department of Transportation (LADOT). (Id.) The mitigation is deferred in that it must only be completed prior to operation of the Gondola. (Id.)

Where specific mitigation measures are required, their efficacy rests on the assumption of full compliance by motorists with all traffic laws. For example, the DEIR

assumes that a visibility hazard at the Alameda Tower will be fully mitigated by banning right turns on a red light there (DEIR, p. 3.17-41); however, common experience shows that Los Angeles drivers do not always obey such restrictions. Similarly, a potential hazard at the Broadway Junction is dismissed by the DEIR on grounds that, if drivers obey the speed limit, they will see the traffic signal at issue in time to stop, thereby avoiding any pedestrian collisions. (DEIR, p. 3.17-42 to 3.18-43.) Again, common experience shows that Los Angeles drivers do not always obey speed limits, and there is no substantial evidence that they will always do so at the Broadway Junction.

The DEIR assigns responsibility for avoiding the pedestrian hazards the proposed Project will create to drivers, rather than requiring the incorporation into the Project design of physical mitigation measures that will prevent the hazards without assuming perfect compliance by all drivers with traffic laws. CEQA, on the other hand, assigns the responsibility for mitigating all significant impacts to the project proponent, a responsibility Metro has not carried here. There is a lack of substantial evidence that TRA A will successfully mitigate Project hazards.

Response P700-59 Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of whether the proposed Project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Mitigation Measure TRA-A includes visibility enhancement features to reduce impacts at the Alameda Tower and Chinatown/State Park Station.

Mitigation Measure TRA-A was originally written to permit flexibility in the ultimate measures to be taken prior to further development of the proposed Project design. However, the necessary mitigation at each location was further identified and is discussed in the Draft EIR on pages 3.17-41 and 3.17-42 in Section 3.17, Transportation. As stated on page 3.17-41, the specific mitigation at the Alameda Tower is prohibiting right turns on red from westbound Alhambra Avenue to northbound Alameda Street. In response to comments suggesting that Mitigation Measure-TRA-A did not clearly define the visibility enhancements for the proposed Project, Mitigation Measure-TRA-A has been revised to identify the necessary mitigation for each location, consistent with the analysis in the Draft EIR. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for revisions to Mitigation Measure-TRA-A, identifying visibility enhancements the proposed Project would design during construction and complete prior to proposed Project operations at Alameda Tower and Chinatown/State Park Station. This would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a westbound right turn on red. This Mitigation Measure is not intended to mitigate for potential vehicle and pedestrian conflict; rather, it is recommended to alleviate potential visibility issues for vehicles traveling northbound on Alameda Street. No right turn on red restrictions are commonly used at locations with potential visibility issues. As stated on page 3.17-42, in Section 3.17,

Transportation of the Draft EIR, the specific suggested action at the Chinatown/State Park Station is channelization of pedestrians to the crosswalk where visibility is sufficient. In response to comments, TRA-PDF-A has been added to the Final EIR in Sections 5.0, Corrections and Additions, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station. As described in TRA-PDF-A, the proposed Project would stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

As detailed on pages 3.17-40 to 3.17-41 and 3.17-42 to 3.17-43 of the Draft EIR, no visibility impact would result from operation of the Alameda Station and Broadway Junction, respectively. Both the *A Policy on Geometric Design of Highways and Streets* by AASHTO[21] and the *Highway Design Manual* by Caltrans[22] explain that design speed is dependent on the characteristics of the roadway and the context of the surrounding area. Table 101.2, Vehicular Design Speed, in Caltrans' *Highway Design Manual* provides that design speeds for urban arterials that are main streets in regional/community centers shall be between 30 and 40 miles per hour (mph) and that design speeds for urban arterials in downtowns and city centers shall be 30 mph (note that Caltrans' use of the word "shall" makes the guidance in Table 101.2 mandatory). AASHTO states that urban arterial streets should be designed to permit running speeds of 20 to 45 mph, with speeds in the lower portion of this range applicable to local and collector streets and to arterial streets through more crowded business areas while speeds in the high portion of the range apply to high-type arterials in outlying suburban areas. The context of the streets in the Union Station and Chinatown areas in the vicinity of the proposed Project's proposed Alameda Station is urban downtown/regional center business area. Both suggest that use of 35 mph to determine stopping distance is appropriate as it is within the range mandated by Caltrans for urban regional/community centers, higher than the Caltrans guidance for urban arterials in downtowns and city centers, and on the higher side of the range suggested by AASHTO for urban arterial streets. The design speed used to calculate the stopping sight distance for the Broadway Junction meet engineering requirements and follow standard practices.

Comment P700-60 Finally, TRA A flouts CEQA's basic requirement of full public disclosure. (Pub. Res. Code § 21061; Guidelines § 15003(c) and (d).) The DEIR does not fully disclose what mitigation measures will be required at which location, nor is the process of approval of these measures by LADOT ensured to be open to public scrutiny and comment; the reverse is likely.

Response P700-60 Refer to Response P700-59 above regarding the specificity of mitigation measures at each location and revisions to Mitigation Measure TRA-A. The approval of the measures by LADOT is standard practice and the process outlined in the Draft EIR is

[21] American Association of State Highway and Transportation Officials (AASHTO). 2018. A Policy on Geometric Design of Highways and Streets. Available at: https://store.transportation.org/Common/DownloadContentFiles?id=1776. Accessed August 2023.

[22] California Department of Transportation (Caltrans). 2020. Highway Design Manual, 7th Edition. Available at: https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm. Accessed August 2023.

in concert with the manner in which mitigation measures are determined for projects in the City of Los Angeles. As demonstrated in Section 7.0, Mitigation Monitoring, and Table 6-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the Mitigation Monitoring and Reporting Program will prescribe for agency enforcement of mitigation measures for the proposed Project, including Mitigation Measure TRA-A, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-61 As a result, the DEIR violates CEQA on these additional grounds. Because hazard impacts are not fully mitigated, hazard impacts must be identified as significant in the DEIR and the DEIR recirculated for public review and comment.

Response P700-61 Refer to Responses P700-59, and P700-60 for how implementation of Mitigation Measure TRA-A would result in less than significant impacts to hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project.

Comment P700-62 **XII. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO PROPERLY OR FAIRLY PRESENT AND ANALYZE ALTERNATIVES.**

As our Supreme Court has repeatedly held, the "EIR is the heart of CEQA, and the mitigation and alternatives discussion forms the core of the EIR." In re Bay–Delta cases (2008) 43 Cal.4th 1143, 1162. Here, the DEIR further fails because it did not consider a reasonable range of alternatives, as required by CEQA.

In Public Resources Code Section 21002, CEQA forbids approval of projects with significant environmental impacts "if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Section 15126.6(a) of the Guidelines mandates that agencies may not artificially constrict their consideration of alternatives. They must consider alternatives that can "attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project."

The importance of the consideration of alternatives to the proposed project was emphasized by our Supreme Court in Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564, which held that "[t]*he core of the EIR* is the mitigation and alternatives section." (Emphasis added.) The Guidelines prescribe that a "reasonable range" of alternatives must be considered, "even if those alternatives would impede to some degree that attainment of the project objectives or would be more costly."

Guidelines § 15126.6(b). Both the "no project" alternative and any alternatives rejected during the DEIR development must be examined.

Response P700-62 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, including the no project alternative and those considered but dismissed, pursuant to CEQA. Refer to Response P700-63 for discussion of the alternatives analyzed in the Draft EIR.

Comment P700-63 **A. The DEIR Presents False Alternatives And Biased Project Objectives That Artificially Favor the Gondola.**

Here, the Alternatives section fails in two ways. First, it fails to propose a reasonable range of alternatives. The DEIR seriously considers only the alternatives that are mandated in the Guidelines (the no-project alternative and alternatives discarded during EIR development), the Spring Street Alternative, and the so-called Transportation Management System (TSM) alternative. This letter will refer to this alternative as the Express Bus service, since it basically consists of expanded Dodger Express Bus service between Union Station and Dodger Stadium.

Response P700-63 Public Resources Code sections 21001(g), 21002.1(a), and 21061 require that an EIR identify alternatives to a proposed project. CEQA Guidelines section 15126.6(a) expands on the statute by stating that an EIR must include a "reasonable range" of alternatives to the project "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Likewise, CEQA Guidelines section 15126.6(f)(2)(A) further clarifies that an EIR is not required to analyze alternatives that would not eliminate or substantially reduce significant adverse effects. An agency's selection and consideration of alternatives is governed by a "rule of reason." (CEQA Guidelines, § 15126.6(a).) Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, as required by CEQA, the alternatives analysis included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project. (See *id.*, § 15126.6,(e).) CEQA also requires that an EIR identify one "environmentally superior alternative" from the range of reasonable alternatives that are evaluated; the "environmentally superior alternative" cannot be the "No Project" alternative or the underlying project.

The Draft EIR considered a "No Project Alternative," the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Evaluation of each of the alternatives included a description of the alternative, the environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area, and the environmental impacts of each alternative as compared to the

proposed Project, followed by a general discussion of the extent to which the underlying purpose and project objectives are obtained by the alternative. Further, in compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, in Section 4.0, Alternatives, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Section 4.2.1 considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the project objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements. Refer to Response P700-64 for discussion of how the proposed Project objectives comply with CEQA Guidelines section 15126.

Comment P700-64 The DEIR's second violation of CEQA and the Guidelines is that the list of Project objectives by which it evaluates the alternatives is carefully and heavily slanted to favor the proposed Gondola. For example, the objectives include providing passengers with scenic airborne views, which cannot be attained by any alternative to the Gondola. (Project Objectives 2 and 7, DEIR, p. 4-5 to 4-8), and listing the use of a gondola as a project objective in and of itself, one that no non-gondola alternative could achieve. (Objective 8, DEIR, p. 4-7.)

Response P700-64 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. These objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree." (CEQA Guidelines, §15126.6(a)–(b).) The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. A reasonable range of alternatives were considered as the

proposed Project's objectives are not so narrow that they preclude consideration of alternatives to the proposed Project, including the Transportation Systems Management Alternative.

Comment P700-65 Third and most important, the DEIR fails to develop the Express Bus expanded bus service alternative fully and accurately, so that it might be fairly evaluated. This alternative would avoid every significant environmental impact of the proposed Project, could be carried out quickly and with minimal construction, thereby avoiding all the lane closures, detours, and disruption that years of station and tower construction would cause, and would deliver almost every benefit expected from the Gondola.

The DEIR deliberately downplays the feasibility of the Express Bus alternative and its ability to avoid every significant impact of the Gondola Project while meeting almost every objective set out in the DEIR except the views and "unique experience" of the gondola and the increased connectivity with the State Historic Park and its surrounding neighborhood. The Guidelines explicitly provide that an EIR must "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project *even if these alternatives would impede to some degree the attainment of the project objective*, or would be more costly." Guidelines § 15126.4(b) (emphasis added).

Response P700-65 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management ("TSM") Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would fail to meet the following objectives to the same extent as the proposed Project, as while it would provide a connection to Dodger Stadium, it would not provide a faster or more efficient alternative compared to the proposed Project, and while it would transition private vehicles to Dodger Stadium Express buses, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion: (Objective 1) Expand mobility options for transit riders through a direct transit connection between LAUS and Dodger Stadium, a regional event center; (Objective 3) Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium; (Objective 4) Enhance

safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area; (Objective 5) Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days; (Objective 6) Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property. In addition, the TSM Alternative would fail to fulfill Objectives 2, 7 through 10 and 12 because it is not an aerial rapid transit system and otherwise does not offer a unique experience to riders, and would not enhance community connectivity or park access. Further, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Response P700-64 for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium.

Comment P700-66 **B. The Spring Street Alternative Fails to Meet the Requirements of CEQA and Should Be Removed From the DEIR.**

As noted by the Court in Save Our Capitol:

> Meaningful analysis of alternatives in an EIR requires an analysis of meaningful alternatives. The purpose of an EIR "is not to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated. . . . [T]he key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (Watsonville Pilots Assn. v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1089, 108 Cal.Rptr.3d 577.)

The Spring Street Alternatives fails to comply with this mandate. It is not a meaningful alternative. As detailed in DEIR Table 4-1: Alternatives Conformance with Objectives, the Spring Street Alignment Alternative meets all of the Project Objectives. However, the Spring Street Alternative would impact a greater area with the State Historic Park, and as detailed in DEIR Table 4-3: Alternative Impact Comparison, the Spring Street Alignment Alternative does not reduce any of the Project impacts. This alternative thus fails to meet the basic purpose of an alternative, "to meet most of the project's objectives but have a reduced level of environmental impacts." It should therefore be eliminated from the DEIR as it serves only as a straw man.

Response P700-66 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an

"environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. As discussed therein, the Spring Street Alignment Alternative would provide an ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. The Spring Street Alignment Alternative was included in the Draft EIR because it provides an aerial rapid transit option that would cross over the Los Angeles State Historic Park, and that maintained transit access to the Park and surrounding communities.

The Spring Street Alignment Alternative meets all of the following Project Objectives, including objectives not specifically linked to aerial rapid transit, to: (1) expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium; (2) attract new transit riders to the Metro system through a unique experience connecting to Dodger Stadium; (3) improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium; (4) enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area; (5) reduce transportation related pollution and greenhouse gas emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special events days; (6) increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property; (7) improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodgers fans; (8) bring a world class aerial transit system to the Los Angeles area; (9) enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park; (10) identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access; (12) provide a sustainability form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality; (13) maximize the Project's alignment along the public ROW and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint within the Los Angeles State Historic Park. As such, the Spring Street Alignment Alternative would not meet the following objective to the same extent as the proposed Project, and therefore, is considered to be only partially consistent with Objective 11 to "Minimize the Project's environmental footprint through the integration of sustainability and environmentally friendly design features into the materials, construction, operations, and maintenance of the proposed Project." Consideration of the Spring Street Alignment Alternative complied with CEQA, which does not prohibit consideration of alternatives that would impede, to some degree,

the attainment of the project objectives, or would be more costly. (CEQA Guidelines, § 15126.6(a).)

Comment P700-67 **C. The Existing Express Bus Service to Dodger Stadium is a Feasible Alternative, and Would Avoid All Adverse Impacts of the Gondola.**

The Express Bus alternative is identified by the DEIR as, along with the No Project alternative, the Superior Alternative. (DEIR, p. 4-75.) The DEIR states "both the No Project alternative and TSM [Express Bus] Alternative would not result in significant unavoidable impacts to any environmental considerations" (DEIR, p.4-74), a convoluted way of saying that the Express Bus alternative has no significant environmental impacts. The Express Bus avoids the Project's construction impacts, which are the only significant impacts the DEIR acknowledges, and would avoid countless other impacts that the Project would cause, as discussed in this and other comment letters. As detailed below, it would also fulfill almost all of the Project's objectives. Accordingly, Express Bus is superior to the Project, and should be adopted by Metro.

Express Bus service would take cars and their pollutant emissions off the road, although the DEIR does not bother to calculate how much pollution the Express Bus could eliminate. If the buses were upgraded to operate on electricity, the Express Bus alternative would also be zero-GHG emissions. Such buses would reduce air pollution in one of the nation's most heavily polluted urban areas. (DEIR, p. 3.3-2.)

Although the Express Bus fleet might add to existing traffic, the DEIR ignores the obvious mitigation for this possibility of extending the existing bus-only lane on Sunset up Vin Scully Avenue and into the parking lots, thereby mitigating any congestion impacts, and making the lane reversible to prevent post-game/event congestion. The DEIR fails in its duty to examine feasible alternatives by failing to fairly and fully present the Express Bus alternative, thereby attempting to tip the scales to favor the Project. This is a violation of CEQA.

The DEIR at pp. 4-59 to 4-62 acknowledges that it is feasible to carry out the Express Bus (TSM) alternative. As Metro carefully structures this alternative, the Dodger Express bus fleet would expand to 77 buses from the current 7 to 11 buses, in order to be able to transport the same number of passengers as the Gondola is projected to carry (assuming the Gondola works as expected). (DEIR, p. 4-71.) The DEIR does not state, let alone prove, that this expansion would be infeasible. The DEIR makes no comparison between the cost of expanding the Express Bus service and the underestimated $125 million price tag of the Gondola.[26] Expanded Express Bus service may well be cheaper, as well as a transportation method proven by years of local experience.

The DEIR states that this expanded bus fleet would require moving the bus loading/unloading area to a nearby Metro property and reconfiguring some parts of Union Station and the immediately surrounding streets. (DEIR, p. 4-61.) However, the

DEIR does not show that this is infeasible, only inconvenient. Given the number and months (in one or two cases, years) of lane closure and the resulting traffic diversion and congestion that the Gondola would cause (see, e.g., DEIR at 3.9-32 through 3.9-43), the expanded Express Bus service alternative is far more feasible and far less disruptive to Los Angeles residents. It would also confer the benefit on Metro that the expanded bus fleet would be available to provide zero-emission service on other routes on non-game, non-event days (about 265 days per year [DEIR p. 2-10]). It would also provide Metro with a much-needed opportunity to capture new fares that would benefit the entire Metro public transit system and Los Angeles residents more broadly. (See January 8, 2023, Wall Street Journal article, "Public Transit Goes Off the Rails With Fewer Riders, Dwindling Cash, Rising Crime," p. 1, at https://www.wsj.com/articles/subwaymta-bart-public-transit-new-york-boston-san-francisco-11673198418?mod=hp_lead_pos7.)

By failing to fairly and fully present the Express Bus alternative – an alternative that is feasible, environmentally superior, majority-Project-goal fulfilling and public revenue generating – the DEIR violates CEQA.

Guidelines Section 15126.6(b) requires reasoned consideration of alternatives that do not meet every objective of a project's proposer, or that increase costs. Here, the DEIR admits that the Express Bus alternative will meet or moderately meet Project Objective 3 (Provide efficient, high-quality transit from LAUS to Dodger Stadium [DEIR, p. 4-5]), Project Objective 4 (Enhance the safety of neighborhoods around Dodger Stadium by lessening the number of cars driving to and from Stadium games and events [DEIR, p. 4-6]), Project Objective 5 (Reduce transportation related pollution and GHG emissions [DEIR, p. 4-6]), Project Objective 6 (Increase connectivity to the region's public transportation hub [DEIR, p. 4-6]), Project Objective 11 (Minimize the project's environmental footprint [DEIR, p. 4-7]), and Project Objective 12 (Provide a sustainable form of transit [DEIR, p. 4-8]). Project Objective 13, relating to ART alignments, is not relevant to the Express Bus service. (DEIR, p. 4-8.)

While the Express Bus alternative would not meet Project Objectives 2 (Attract new transit riders to the Metro system through use of a gondola) and 7 (Improve transit rider experience by providing unique scenic views), these are self-serving, circular Objectives that favor the Gondola. The DEIR's claim that expanded Express Bus service would not meet Project Objective 1 (Expand mobility options for transit riders) is not supported by any experience, only by speculation that a new mode of transit – the Gondola Project – is the only way to bring in an unquantified number of new riders to Metro. Given the success of the current Express Bus service (DEIR, pp. 4-59 to 4-60), such speculation is unfounded. Express bus service works.

Further, the DEIR has deliberately set up the Express Bus alternative for failure by designing it so that the buses would use compressed natural gas as fuel, instead of zero-polluting electricity. Posting the use of natural gas ensures continued pollutant

emissions, while use of electric buses would eliminate them. Again, the DEIR has chosen to present the Express Bus alternative in a way that makes this alternative fail to achieve important Project Objectives. The public and decision makers cannot know how long the Gondola's novelty will draw riders out of their cars, thereby reducing emissions of conventional pollutants and GHGs. In contrast, the Express Bus service has a proven track record, which could only be improved by an expanded and electric-powered bus fleet.

In addition, Metro currently operates a large number of Express buses that run from various outlying areas to downtown Los Angeles and other destinations, but that do not service Dodger Stadium. (DEIR, p. 3.17-13.) Some or all of these existing Express bus routes that service downtown Los Angeles could be modified to add Dodger Stadium as an additional or final stop on game or event days. This would allow them to bypass the crush at Union Station that the DEIR posits would result from increased Express Bus service. (DEIR, p. 4-60 to 4-61.) By ignoring this obvious opportunity, the DEIR again handicaps the Express Bus service in its comparison with the Gondola.

The DEIR should be revised and recirculated to make a fair comparison of the Gondola to expanded, electric Express Bus service as an alternative to the Gondola. Alternatively, the expanded, electric Express Bus service, including service from outlying areas, should be explored as an Alternative and compared to the Gondola.

Fairly considered, the TSM (Express Bus) alternative meets every non-Gondola-biased Project Objective except those dealing with enhancing transit connectivity for the State Historic Park and Elysian Park, and even these Objectives could be partially met if Metro simply set up transit hubs at these locations, something it does not need the Gondola to do.

As an alternative that eliminates the Project's environmental harm by not requiring the construction that produces the harm, that meets most of the Project's unbiased objectives, and that meets them with far less damage to the City's transportation systems than what will be caused by Project construction, the Express Bus alternative fulfills all the legal requirements for a viable alternative. Should Metro choose the Gondola as the project it approves, it must make the findings required by Public Resources Code Section 21081(a)(1), must justify rejecting the Express Bus alternative (per Public Resources Code Section 21002), including the Express Bus with the expansions proposed in this letter, and may need to adopt a Statement of Overriding Considerations, as required by Public Resources Codes Section 21081(b). All of these findings must be supported by substantial evidence in the record. The DEIR as it now stands cannot provide this evidence.

The DEIR must be revised and recirculated to fairly present and fairly consider the Express Bus alternative, expanded and powered by electricity, as an alternative.

Footnote 26: The $125 million price tag does not include the price of a land lease at Union Station or the cost of acquiring land at Dodger Stadium. (ARTT Response to Metro's Request for Information at p. 45.) The real cost of the proposed Project would be higher than the initial estimate, probably much higher.

Response P700-67 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management ("TSM") Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Response P700-64 for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium.

As discussed on page 4-63 and on page 4-71, the Draft EIR concluded that, even with a substantially increased Dodger Stadium Express bus capacity, the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would render the Alternative substantially less competitive with driving time than the proposed Project, thus reducing its ridership potential compared to the proposed Project. As such, reductions in driving to Dodger Stadium and associated reductions in VMT would be less than for the proposed Project.

As detailed in Topical Response H, a bus-only alternative with buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus

only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. Refer to Response P700-63 for a discussion of how the Draft EIR complied with CEQA's requirements to analyze a reasonable range of alternatives, including a "No Project" alternative, to identify an "environmentally superior alternative," and to identify alternatives considered but rejected from further consideration.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-68 **XIII. THE DEIR FURTHER VIOLATES CEQA BY ITS INAPPROPRIATE TREATMENT OF DESIGN OPTIONS.**

The way the Design Options are placed in the DEIR implies that they are not alternatives or significant changes in the Project Description, since they come after both those sections, and calling them "Design Options" minimizes their potential importance. The term "Design Options" makes them sound like they are variants in the appearance, external finishes, or other features that are normally called "design," not changes in location or 25% increase in height. This is a failure of information. The DEIRs inclusion and treatment of "Design Options" has invalidated both the Project Description and Alternatives discussions in the DEIR, and represents an additional fatal flaw in the DEIR.

The Project sponsor and DEIR preparers are attempting to have it both ways, by providing a Project Description, but leaving room for the Project to revert to an earlier, pre-stakeholder-comments version of the Project, without actually including these project options in either an analysis of the Project or an analysis of a fully defined alternative. In this way, the DEIR piecemeals the analysis of a potential project.

At the very least, the DEIR should analyze a project which includes the impact-maximizing combination of design options, to identify the maximum potential project impacts. The DEIR can then use the design options to define a series of impact-reducing alternatives, and as part of the alternative's analysis make clear the package of mitigation measures that appropriately apply to each alternative. Decision-makers would thus be provided with the information they would need to select the Alternative with the best impact-reducing combination of design options, or would actually be able to understand the environmental consequences of picking a particular combination of design options, as each possible combination would represent a discrete alternative. Currently, as written, the design options represent a red-herring that only serve to confuse the reader about the likely impacts of the Project and the likely alternatives under consideration. This is unacceptable under CEQA.

Response P700-68 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how Section 6.0, Design and Use

Options, of the Draft EIR includes design and use options responsive to public comments and stakeholder feedback and describes how environmental impacts from implementation of each design and use option would differ from the proposed Project's potential environmental impacts described in Section 2.0, Project Description, and analyzed in Chapter 3.0, Environmental Analysis, of the Draft EIR, with respect to the particular project component variation. The design and use options provide flexibility for decision makers to potentially adopt one or more minor variations to components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project. As discussed in Topical Response H, the proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project's potential environmental impacts. CEQA recognizes that a lead agency has the flexibility to approve project changes if all components of the revised project were evaluated in the EIR. By analyzing the design and use options in a separate section of the Draft EIR, the Lead Agency retains the flexibility to respond to stakeholder concerns related to individual components of the project while maintaining a stable project description that identifies the project's main features and other information sufficient to foster a complete and informative evaluation of the project's environmental impacts. The design and use options studied in Section 6.0 each present a minor variation to a component of the proposed Project, do not require different project design features or result in new or different impacts requiring different mitigation measures, and otherwise meet the same Project Objectives. The Draft EIR's Project Description provides the required "main features" of the proposed Project, with the Design and Use Options providing minor variants to the proposed Project. Further, because the Design Options are included as part of the Draft EIR, stakeholders can and have provided comments during the Draft EIR public review period, contrary to this commenter's assertion that the proposed Project could "revert to an earlier, pre-stakeholder-comments version of the Project."

Comment P700-69 **XIV. THE DEIR FURTHER VIOLATES CEQA BY ITS FAILURE TO ADEQUATELY ANALYZE GROWTH INDUCING IMPACTS.**

The proposed Project constitutes the construction of a new fixed-route transit system and expansion of fixed-route transit into an area, the Dodger Stadium property, currently not directly served by transit, except on game days. Currently the closest, non-game-day transit is the Number 4 bus, and the closest transit stop to the Stadium property is at Sunset Boulevard and Vin Scully Avenue. The Project thus constitutes an extension of service between the Union Station and Chinatown areas directly onto the Dodger Stadium property.

As discussed more fully above, the Project is not included in the City's Mobility Plan 2035 or in the Transportation System Project List used in preparing the Regional Transportation Plan (Connect SoCal 2020 or the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The Project thus removes an obstacle to

population growth in the Dodger Stadium area in a way that is not consistent with existing land use plans. It therefore is not growth-accommodating. Rather, it is potentially growth-inducing and thus a robust analysis of likely growth-inducement is required in a recirculated DEIR, including in accordance with Guidelines Section 15126.2(d).

The analysis of growth-inducing impacts currently in the DEIR reads like a publicity piece for the proposed Project. The analysis also relies, as a way of avoiding analysis of growth-inducing impacts, on the statement that should "any future development occur in the surrounding proposed Project area, as discussed in Section 3.11, Land Use and Planning, such development would be subject to additional environmental analysis under CEQA, and would be required to comply with City of Los Angeles Community Plan policies encouraging development near transit stations and corridors."[27] The CEQA mandate to address growth-inducement cannot be avoided in this way.

The proposed Project is a private transit system that would extend access to the Dodger Stadium area. As discussed earlier in this letter there are good existing available transit options from the Union Station area to Chinatown. The only area not well served by transit, except on game days, is the Dodger Stadium area.

Given the existing competing transit options for travel between the Union Station area and Chinatown, the Project system will likely largely need to depend on fares to Dodger Stadium to support the system. Given that it has been announced that the fares, for game ticket holders who are projected to be the primary users of the Project[28] will likely be zero, as previously documented in this letter, some source of revenue will be needed to keep this capital-intensive system in operation. Given that such a source has not been disclosed, it is reasonable to assume that additional fare-paying ridership would thus be required to make the system financially viable and that the Project is intended to foster development in the Dodger Stadium area to generate riders, and thus to be growth-inducing. As has been noted by commentators in the link provided above:

> the proposed gondola would be the first step in an entirely new system – a literal ticket to nowhere for approximately 280 days a year. If the goal is to use this project as a backdoor to creating a new neighborhood in the vicinity of Dodger Stadium, **like the one in Atlanta** or **the one being proposed in Kansas City, *the backers of this project need to have the intellectual honesty to say so***.

The DEIR thus needs to analyze the likely growth-inducing impacts of the Project, including its potential to foster growth in the Dodger Stadium area. In addition, the DEIR needs to disclose any intended development Plans for the Dodger Stadium vicinity, and to address those Plans in a recirculated DEIR, as failure to do so constitutes improper piecemealing or project-splitting under CEQA.

Footnote 27: DEIR page 5-60.

Footnote 28: See DEIR Table 3.17-4 reproduced earlier in this letter.

Response P700-69 Refer to Section 5.4, Growth-Inducing Impacts, for a discussion of the potential growth-inducing impacts of the proposed Project as required by Public Resources Code Section 21100(b)(5). Pursuant to CEQA Guidelines Section 15126.2(e), an EIR need only discuss "the ways in which" the proposed project could foster growth, and accordingly does not require an EIR to provide a detailed analysis of the proposed project's effects on growth. A general analysis is sufficient. The Draft EIR's growth inducing analysis considered the potential growth-inducing impacts from the proposed Project in pages 5-57 through 5-60 of the Draft EIR, concluding that construction and operation of the proposed Project would result in less than-significant growth-inducing impacts, with respect to whether the proposed Project would foster population or employment growth, or the construction of additional housing, either directly or indirectly, on both a regional and local scale. As discussed in Section 5.4, and as noted in this comment, the proposed Project does not remove obstacles to growth but instead would increase connectivity in the densely urbanized downtown Los Angeles and provide direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. The Project Study Area includes a population of which approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. As discussed in Chapter 2, Project Description, Dodger Stadium is one of the region's most visited venues; however, there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets, throughout the surrounding communities, and on the nearby freeways. As the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. When complete, the travel time from LAUS to Dodger Stadium would be approximately 7 minutes during peak operations (games/events at Dodger Stadium). Approximately 20 percent of visitors could take aerial transit connected to Metro's regional transit system. By creating a high-quality and high-capacity rapid transit connection between LAUS and Dodger Stadium, the proposed Project would provide a more viable choice in making a trip to a Dodger game or event at the stadium. Further, given that the area in the City where the proposed Project alignment is located is densely urbanized and there are existing planned developments for the area, the proposed Project would be a benefit for existing and planned uses in the area.

Development at Dodger Stadium and in the communities surrounding the alignment would still require their own set of approvals and analysis. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly

segmented or "piecemealed" from a larger development project at the Dodger Stadium property. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. As discussed in Topical Response G, the Dodger Stadium property is approved only for Dodger Stadium and ancillary uses as set forth in the Conditional Use Permit for the Dodger Stadium property, and structures, with restrictive designations and zoning not consistent with the uses speculated in this comment. Accordingly, the potential for development at Dodger Stadium is not reasonably foreseeable, and the Draft EIR's growth inducing analysis need not consider speculative potential impacts pursuant to CEQA Guidelines section 15145. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Response P700-47 for a discussion of the underlying assumptions for proposed Project ridership and VMT reductions, considering the linked article from lay commenters referenced in this comment.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P701 - S&R Partners, LLC, a Riboli Family Company

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P701

Comment P701-1 Re: Comments on Draft EIR for Los Angeles Aerial Rapid Transit project (LA ART), SCH # 2020100007

Dear Mr. Zelmer:

This firm represents S&R Partners, LLC, a Riboli Family company. The family has been a stakeholder in the immediate vicinity of the proposed Los Angeles Aerial Rapid Transit project (Gondola Project or Project) for more than a century since the founding of the San Antonio Winery in 1917. The family is proud to be a multi-generational contributor to the local and regional economy in Los Angeles. The family is a proud employer of hundreds of local residents, and participates philanthropically and civically with leading community-based nonprofit organizations. The family members who run the business were raised in the community within walking distance to the Historic State Park, Chinatown, Solano Canyon, and Lincoln Heights.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the proposed Los Angeles Aerial Rapid Transit project (Project), its DEIR and requested entitlements.

Pursuant to Public Resources Code Section 21167(f), please provide a copy of each and every Notice of Determination issued in connection with the Project.

Response P701-1 Metro has and will continue to comply with its obligations under CEQA, including related to the provision of notices in connection to the proposed Project's environmental review.

Comment P701-2 A. The Proposed Project's Location on Public and Private Properties.

According to the DEIR, the Project's stations and towers would range in height from 78 to 195 feet high. The cable for the gondolas would be suspended as high as 175 feet above the ground, and:

- Alameda Station - would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores between Los Angeles
- Street and Cesar Chavez Avenue. The station would be approximately 173 feet long, 109 feet wide, and 78 feet high at its tallest point, with the passenger loading platform approximately 31 feet above Alameda Street.
- Alameda Tower - would be 195 feet tall with the cable suspended 175 feet above-ground.

- Alpine Tower - would be 195 feet tall at its tallest point, with the cable suspended 175 feet above ground.
- China Town/State Park Station - would be approximately 200 feet long, 80 feet wide, and 98 feet tall at its tallest point, with the passenger boarding platform approximately 50 feet above-grade.
- Broadway Junction – this non-passenger junction would be approximately 227 feet long, 60 feet wide, and 98 feet high at its tallest point, with the platform approximately 50 feet above the ground.
- The Stadium Tower - would stand 179 feet tall with the cable suspended 159 feet above-ground.
- The Dodger Stadium Station – would be approximately 194 feet long, 80 feet wide, and 74 feet high at its tallest point.

With the exception of its terminus at Dodger Stadium, the Project's stations and towers would be constructed on public land, and the gondolas would pass over both public and private property. As noted on DEIR pages ES4-ES8:

- The proposed Alameda Station would be constructed over Alameda Street between Los Angeles Street and Cesar Chavez Avenue, adjacent to the Placita de Dolores and planned LAUS Forecourt.
- Alameda Tower would be constructed on the Alameda Triangle, a portion of City Right of Way (ROW) between Alameda Street, North Main Street, and Alhambra Street.
- The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on city-owned property.
- The proposed Chinatown/State Park Station would be constructed partially on City ROW and partially within the boundaries of the Los Angeles State Historic Park.
- The Broadway Junction would be located at the northern corner of the intersection of North Broadway and Bishops Road (1201 North Broadway) on primarily privately-owned property.
- The proposed Stadium Tower would be located on hillside private property north of Stadium Way between the Downtown Gate entrance road to Dodger Stadium and SR-110.
- The northern terminus of the system would be located in a parking lot at the Dodger Stadium property, where the proposed Dodger Stadium Station would be constructed.

According to the DEIR, the alignment travels over City of Los Angeles right of way, City-owned Property, Metro Property, Caltrans Property, California State Parks Property, and Private Property, as shown in the following Figure reproduced from DEIR Appendix Q. A map should also be provided and coded to show the location of both the public and private land within the full Area of Potential Impact (API) as shown in DEIR Figure 3.1.1. The Project thus involves the use of public land – and the presumed forced taking of private land, not discussed in the DEIR – by a private Project sponsor.[1] DEIR Appendix Q also indicates that the Project requires the acquisition of American National Standards Institute (ANSI) required aerial rights[2] over the following properties, something not disclosed in the Project Description in the body of the DEIR:

- 1028 N. Alameda St.
- 903 N. Main St.
- 901 N. Main St.
- 1251 N. Spring St.
- 1201 N. Broadway
- 455 Savoy St.
- 451 Savoy St.
- 1800 Stadium Way

Footnote 1: DEIR page ES-1.

Footnote 2: ANSI Standard B77.1 regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicle, pedestrians, vegetation, buildings, and other structures.

Land Ownership Along the Project Alignment
Source: DEIR Appendix Q

Response P701-2 This comment requests a map that is coded to show the location of public and private land within the area of potential impact (API). As described in Section 3.1.2, of Section 3.01, Aesthetics of the Draft EIR, the API refers to the geographic area of project visibility for purposes of evaluating the proposed Project's potential visual and aesthetic impacts. The API is broader than the proposed Project's alignment.

Section 2.5.1 of Section 2.0, Project Description, of the Draft EIR details the proposed Project's alignment, noting that the proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. Figure 2-8 in Section 2.0, Project Description, shows the portions of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property, which are described more specifically in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR. The Draft EIR does not need to be revised to include a map of the land ownership within the API.

This comment also assumes that the proposed Project will involve the taking of private land. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2.0, Project Description, and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.) Further, to the extent eminent domain is used to acquire property rights necessary for operation of the proposed Project, the exercise of eminent domain by any public agency would be subject to a separate process as required by California law. Refer to Response P701-7 for further discussion of Metro's eminent domain authority.

Finally, this comment states that although Appendix Q indicates that the proposed Project requires the acquisition of American National Standards Institute (ANSI) aerial rights over properties within the proposed Project alignment, this information has been omitted from the Section 2.0, Project Description. CEQA does not require that this level of detail be included in the Project Description. (CEQA Guidelines § 15124.) The Project Description already describes aerial clearances needed to comply with the ANSI Standards in Section 2.4.6 and directly refers to Appendix Q, which contains additional information on this topic. (See Draft EIR, p. 2-19.) Moreover, Figure 2-7 in

Section 2.0), Project Description depicts the ANSI requirements and Additional Separation Buffer.

Comment P701-3 B. The DEIR's Lack of Clarity on the Issue of Eminent Domain.

The DEIR needs to specify if Metro contends that it has the power of eminent domain for use in furtherance of the Project. If yes, then the DEIR should identify the specific statutory bases, if any, that would allow it to exercise the power of eminent domain for the Project.

The DEIR also needs to include a map, keyed to document the mechanisms which would be used within the API, to allow private use of public lands. For example, DEIR pp. 2-81 to 2-82 appears to indicate that in the case of the City of Los Angeles, this would be accomplished via a franchise agreement and a 20-year Development Agreement.

The proposed franchise agreement and Development Agreement must be made available concurrently with a recirculated DEIR.

Response P701-3 The purpose of the Draft EIR is to inform the public and decision makers generally of the significant environmental impacts of the proposed Project. (See CEQA Guidelines § 15121(a).) The focus of an EIR is the significant effects on the environment (*id*., § 15143), not on the mechanisms for how property for a proposed project may be acquired. The Draft EIR explains the mechanisms, including aerial easements, that may be required for operation of the proposed Project. (See, e.g., pp. 2-61 to 2-62 of Section 2.0, Project Description.) CEQA does not require the Draft EIR to also include a map keyed to these mechanisms. (CEQA Guidelines § 15204 [lead agencies are not required to "provide all information requested by reviewers."].) It is also speculative at this point whether Metro, or any public agency, would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].) Finally, CEQA does not require Metro to provide drafts of a proposed franchise agreement or Development Agreement concurrently with a Draft EIR. Such documents would be negotiated with the City of Los Angeles, acting as a responsible agency for the proposed Project. (See Draft EIR, pp. 2-61 to 2-62.) This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. Refer to Response P701-7 for further discussion of Metro's eminent domain authority.

Comment P701-4 In addition, the DEIR should inform the public what the proposed mechanism is for acquisition of aerial rights and the associated permitting agency(s). In the absence of clear information regarding the mechanism for allowing private use of public lands, and for acquiring aerial rights over private lands particularly if forcibly taken through eminent domain, the Project description is deficient.

Response P701-4 The Draft EIR describes the potentially required permits and approvals for the proposed Project's operation within or over public rights-of-way, such as aerial

easements, and the responsible agencies in Section 2.10 of Section 2.0, Project Description, including permits and approvals from Metro, the City of Los Angeles, State Parks, and Caltrans. CEQA does not require the Draft EIR to identify how the Project Sponsor will acquire any property interests necessary to operate the proposed Project across public or private lands. (See, e.g., CEQA Guidelines § 15143 ["The EIR shall focus on the significant effects on the environment."].) Refer to Responses P701-3 and P701-7 for further discussion of Metro's eminent domain authority.

Comment P701-5 As noted in the Historic Resources Technical Report included in Appendix G of the DEIR, there are 12 previously-identified historical resources within the proposed Project's API. Two of the historical resources are historic districts with contributing resources located within the API. In addition, the historic resource consultants identified the El Grito mural as eligible for listing in the National Register of Historic Places (National Register).

The next Figure, reproduced from DEIR Appendix G, shows the Project alignment and API defined for purposes of analyzing the historic resource impacts of the Project.

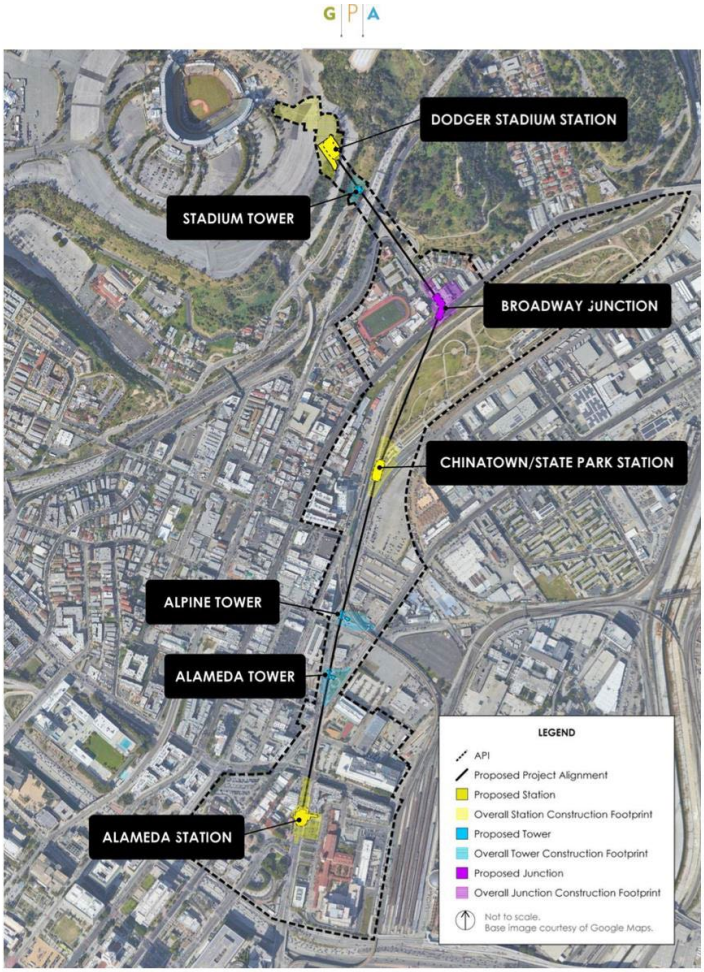


Figure 3: Area of Potential Impact (API). Base image courtesy of Google Maps.

Historical Resource Technical Report – ART Project, Los Angeles 5

Project Alignment and Area of Potential Impact
Source: DEIR Appendix G

The historic resources within the API identified in DEIR Appendix G include:[3]

1. Los Angeles Union Station Passenger Terminal and Grounds
    1A. Macy Street Grade Separation
2. Los Angeles Plaza Historic District 2A. Garnier Block
    2B. Sanchez Building
    2C. Old Plaza Fire House
    2D. Hellman-Quon Building
    2E. Masonic Hall (Masonic Building)
    2F. Merced Theatre
    2G. Pico House (Pico Hotel)
    2H. Vickrey-Brunswig Building
    2I. Plaza House
    2J. Plaza (Plaza Area, Plaza Park)
    2K. Old Plaza Church (Nuestra Señora Reina de Los Angeles Church [Our Lady Queen of the Angels])
    2L. Plaza Community Center (Biscailuz Building)
    2M. Plaza Methodist Church
    2N. Plaza Substation
    2O. Avila Adobe
    2P. The Winery
    2Q. Machine Shop
    2R. Sepulveda House
    2S. Pelanconi House
    2T. Hammel Building
    2U. Italian Hall
3. El Grito (The Cry) Mural
4. Los Angeles Terminal Annex Post Office
5. Philippe the Original
6. Granite Block Paving
7. Capitol Milling Company
8. 1035 N. Broadway
9. St. Peter's Italian Catholic Church
10. Cathedral High School
11. 451 E. Savoy Street
12. Charles B. Wellman Residence
13. Arroyo Seco Parkway Historic District

Footnote 3: DEIR Appendix G, page 17.

Response P701-5 This comment provides a general recitation and characterization of Section 3.5.2 Environmental Setting, of Section 3.05, Cultural Resources, of the Draft EIR. Because

the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P701-6 DEIR page ES-9 indicates that construction of Broadway Junction requires the demolition of the existing commercial building located at 1201 N. Broadway. Does the Project sponsor own this building, or must it be acquired? If it must be acquired, what is the mechanism of acquisition? In the absence of this information, the Project description is again deficient.

Response P701-6 Ownership of 1201 N. Broadway is beyond the scope of the Draft EIR and Project Description. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) Section 2.5.1.4 of Section 2.0, Project Description, of the Draft EIR explains that the existing commercial building located on 1201 N. Broadway would be demolished prior to construction in order to develop the Broadway Junction. The Draft EIR also describes and analyzes the potential environmental impacts associated with demolition of the existing commercial building located at 1201 N. Broadway. (See, e.g., Draft EIR, pp. 3.2-4, 3.4-9, 3.4-16, 3.5-48, 3.9-28 to 3.9-30, 3.9-47, 3.19-19, 3.19-25, 3.20-19, 3.20-32.) As stated in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the Project Sponsor has an arrangement for aerial rights over 1201 N. Broadway.

Comment P701-7 C. Eminent Domain Concerns and Questions.

Although the DEIR does not explicitly reference Metro's use of eminent domain, a hidden assumption within the DEIR and Project description is Metro's supposed ability to exercise the power of eminent domain against private property owners for the benefit and advantage of LA ART, the private Project proponent. The DEIR fails as a legal document on this ground.

Although LA ART in response to comments it provided to Metro suggests Metro has the power of eminent domain to forcibly take the private property rights of other parties in furtherance of the Project, the stated statutory "rationale" as supplied by LA ART to Metro was based on Public Utilities Code provisions. (Exhibit 1 [LA ART Phase II Request for Additional Detailed Information, p. 9].)

However, those cited sections (PUC §§ 130252 and 130254) do not clearly provide Metro with the power of eminent domain for a project such as the Project, which throughout the DEIR and public record concerning the Project has unambiguously been described as being privately funded, privately operated and privately owned. Indeed, contrary to LA ART's assertions and the DEIR's assumptions regarding Metro's alleged ability to use eminent domain for the Project, PUC Section 130521 provides:

> The commission may acquire by deed, purchase, lease, contract, gift, devise, or otherwise, any real or personal property, structures, rights, rights-of-way, franchises, easements, air, land, and development rights, and other interests in

> lands located within this state necessary or convenient for the construction or operation of a project, upon terms and conditions it deems advisable, and to lease, develop, jointly develop, maintain, operate, or dispose of any property, right, or interest in the manner that is necessary or desirable to carry out the objects and purposes of this chapter. Nothing in this chapter provides eminent domain power. (Emphasis added.)

As a result, we believe the Project and DEIR are based on the false premise that Metro can use eminent domain to seize private property owners' private property rights for the benefit of LA ART and the Project.

Response P701-7 The purpose of the Draft EIR is to inform the public and decision makers generally of the significant environmental impacts of the proposed Project. (See CEQA Guidelines § 15121(a).) The focus of an EIR is the significant effects on the environment (*id*., § 15143), not on the mechanisms for how property for a proposed project may be acquired. It is speculative at this point whether Metro, or any other public agency, would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].)

This comment also misinterprets Metro's eminent domain authority. Metro is a public entity duly organized and existing under the laws of the State of California and is vested with the authority to exercise the power of eminent domain to acquire private property for transportation purposes pursuant to the Public Utilities Code. (See, e.g., Pub. Util. Code §§ 30503, 30600, 130220.5(a).) Further, Public Utilities Code section 180152 confers broad authority on Metro to "make contracts and enter into stipulations of any nature whatsoever, either in connection with eminent domain proceedings or otherwise . . . and to do all acts necessary and convenient for the full exercise of the powers granted in this division." Public Utilities Code section 130521, which comes from the Los Angeles County Transportation Commission Revenue Bond Act, does not preclude or prohibit the exercise of eminent domain. The purpose of the Revenue Bond Act is "to provide an alternative method of financing in acquiring, constructing, or rehabilitating facilities to be used as part of [Metro's] transit systems." (Pub. Util. Code § 130502.) Refer to Response P701-3 for further discussion. The attached document is noted but predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. Accordingly, no further response is required. However, the comment suggests that the Project Sponsor supplied the document attached to this letter to Metro. Rather, the attached "Exhibit 1" is Metro's request for additional information regarding the project as part of the unsolicited proposal process, including which policies may potentially apply. "Exhibit 1" does not provide the Project Sponsor's responses to this request, contrary to this comment's characterization of the document.

Comment P701-8 In addition to violating our client's constitutional rights under California Constitution Article I, § 19, and the 5th Amendment to the U.S. Constitution, and similarly the

rights of other private property owners, the structure of the Project and implied ability of Metro to seize private property for it, implicates a separate violation of CEQA, that of predetermination. "[A]n EIR must be performed before a project is approved, for [i]f postapproval environmental review were allowed, EIR's would likely become nothing more than post hoc rationalizations to support action already taken.' (Laurel Heights I, at p. 394, 253 Cal.Rptr. 426, 764 P.2d 278.)" Save Tara v. City of West Hollywood (2008) 45 Cal.4th 116, 130. The DEIR already, implicitly, embodies a determination by Metro that it will attempt to aid LA ART, the private Project proponent, through the use of eminent domain – over the objections of private property owners such as our client. That is a form of precommitment that undermines the legality of the DEIR and shows Metro "failing to proceed in the manner CEQA provides." Id. at 131.

Rather than simply accede to this premise, we ask the following of Metro and request a clear and direct response:

> Does Metro contend it has the power of eminent domain to take private property or private property rights for and/or in furtherance of the Project?

This issue has not been openly addressed in the DEIR, but must be as part of this process.

Response P701-8 As CEQA requires, Metro prepared the Draft EIR for the proposed Project in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. (See CEQA Guidelines § 15121(a).) Metro will consider whether to certify the EIR and approve the proposed Project at a public hearing in the future. Metro has not pre-committed to the proposed Project. Further, it is speculative at this time to assume Metro would exercise its eminent domain authority to acquire property for the proposed Project. (CEQA Guidelines § 15145.) If Metro decides to exercise that authority, it will be subject to the statutory processes set forth in California Code of Civil Procedure sections 1240.10 *et seq.* Refer to Responses P701-3 and P701-7 for discussions of the use for eminent domain for the proposed Project and Metro's eminent domain authority.

Comment P701-9 D. Conclusion.

If the Project sponsor seeks to proceed with the Project, the DEIR must be rewritten to correct these errors and omissions and then recirculated for public review and comment. Thank you for your review and responses to these comments.

Very truly yours,
/s/ Robert P. Silverstein
ROBERT P. SILVERSTEIN
FOR
THE SILVERSTEIN LAW FIRM, APC

Response P701-9 This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P702 – Savoy Street

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P702

Comment P702-1 We, as residents of Savoy Street, are writing to voice our opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" to Dodger Stadium, or "The Gondola Project"). This project has been – and continues to be – pushed on us without adequate information.

Response P702-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P702-2 The first-time residents were notified about The Gondola was in September 2020, with the Notice of Preparation of the Draft EIR. By that time, LA ART had already selected the two potential routes for The Gondola. This happened without any public outreach or meetings, depriving us of the opportunity to provide input early-on for a private developer's plan to occupy the airspace over our homes, public streets and parks. Metro has betrayed our communities by approving LA ART's outreach plan and allowing the project to progress to this stage through this untransparent and backward process, front-loading the approvals process with the EIR.

Response P702-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were

provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment P702-3 To this day, LA ART still has not provided a feasibility study or funding plan. We can only wonder if this enormous infrastructure project is financially sustainable. Without adequate and consistent funding, The Gondola cannot be properly maintained and secured, and would pose a safety risk to our communities, creating a substantial liability for taxpayers. The news that Frank McCourt intends to "donate" the gondola project to Climate Resolve, a nonprofit with zero experience with construction and operation of transit projects and an annual budget of less than $1 million, does not inspire confidence. Furthermore, according to the documents submitted for Metro's November 16, 2022, Ad Hoc Olympics Planning Committee meeting, Metro has listed the Aerial Rapid Transit project on a comprehensive list of projects under consideration for federal and state funding in preparation for the 2028 Olympic Games. This suggests that the staff at Metro believes that public funding is needed for this project, despite all of the claims that The Gondola would not use taxpayer dollars. Metro should not be volunteering to seek out taxpayer dollars for a project that claims to be 100% privately financed.

Response P702-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise, including funding for consultant and technical work for the EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. At Metro's November 16, 2022, Ad Hoc Olympics Planning

Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A). The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A).[23]

Comment P702-4 Even when we were finally notified in September of 2020 with the NOP, the information provided was vague. There was no initial or feasibility study – this for a mode of transit that is novel to the US. Instead of a feasibility study, there was a figure, erroneously labeled "Examples of Gondola Systems," which included photos of cable car systems from around the world. None of those systems use 3S gondola technology for urban transit at the capacities planned for The LA ART Gondola. The only aerial cable systems used for urban transit in the US are the Portland Aerial Tram and the Roosevelt Island Tram. Trams, however, are much simpler; they are lower-capacity systems with only 2 cabins that stay attached to their haul rope and alternate back and forth between two stations. 3S tricable gondolas are detachable grip systems that circulate 20, 30 or even 50+ cabins at a time between two or more stations. LA ART's suggestion that The Gondola project uses proven technology for this proposed application is disingenuous at best.

Response P702-4 The proposed Project's Notice of Preparation ("NOP") complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. The NOP fully complied with Section 15082(1)(a), providing an adequate project description, the project location (including a map of the proposed project alignments as well as a narrative description), and probable environmental effects. Sufficient information was provided in the NOP to guide the responsible agency consultation process, as the NOP provided a written project description detailing the components of the proposed aerial gondola system, the proposed project alignment, project location and environmental setting, as well as the overall project purpose. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Moreover, the Draft EIR itself serves as a "feasibility study" for the proposed Project, with 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban

[23] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P702-5 As several commenters noted in their NOP comments, the Notice of Preparation did not contain adequate information for the public to make informed comments about the potential impacts that should be examined in the draft EIR. Problems with the NOP include the following:

- Zero information was provided about the towers, what they might look like, how many there might be and where they could be located.
- There was no information about the intermediate stations, except their locations on a map.
- The approximate height of the cables and cabins – over our homes, streets, and parks – was also not disclosed in the NOP.
- The NOP announcement was so confusing that at least one person, who stated their support for the project, claimed to live under the path of the gondola, when in actuality, their residence was nowhere near either of the proposed routes.
- The NOP also did not include an intermediate station at the southern entrance of Los Angeles State Historic Park. This station was not publicly disclosed until 8 months later, in May 2021. The decision to locate a station at this location and to study it in the DEIR was made without any prior notice or opportunity for community feedback.

Response P702-5 Refer to Response P702-4 for a discussion of how the NOP complied with CEQA. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning

process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment."

Comment P702-6 Metro, in its role approving LA ART's outreach plan, has betrayed us. This DEIR, which is filled with misleading images and false assumptions that minimize the impacts of this project is a further betrayal and insult. Despite the breadth of this 8,000 page document, there is still little information addressing how this gondola, which would be new technology for LA, would be operated, secured, financed, and maintained. This document fails as an informational document.

Response P702-6 The comment provides a series of general statements regarding the standards of adequacy for an EIR, including the operation, security, financing, and maintenance. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of the proposed Project design, system operations (including typical operating logistics, queuing and ticketing/fare checking, maintenance, safety systems and ancillary elements, and other such features), and technology. Refer to Topical Response J, Gondola Design and Operations, for discussion of the proposed Project's design and operations, including discussion of the safety and operations features of the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the Project. No public sources of funding have been sought or committed to the proposed Project. The general comments regarding adequacy of the Draft EIR are either not specific to the analysis contained within the Draft EIR or are requesting formatting and content that is otherwise not required by CEQA. Accordingly, no further response is required.

The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P702-7 Only after the technical and financial feasibility of the LA ART gondola project was established should there have been a draft EIR and a comment period. Metro and LA ART are asking members of the public to comment on the environmental impacts of a project when the project still has too many unknowns, especially in terms of implementation, which will be critical to both the impacts and sustainability of this project. This has been, and continues to be, an enormous waste of our collective time and energy.

Response P702-7 As discussed in Section 2.0, Project Description, of the Draft EIR, forms of aerial transit technology have been available and utilized for the last 100 years. Modern applications have seen the evolution of aerial rapid transit technology as a feasible mode of urban rapid transit. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with their surrounding urban environments. Furthermore, prior to the release of the Draft EIR, analysis was conducted to consider the technical feasibility, constructability, and operational potential of the proposed Project. Over the course of the proposed Project's feasibility analysis and engineering leading up to the Notice of Preparation, the proposed Project continued to evaluate the proposed Project's stations, junction, and towers. The Draft EIR itself also serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment P702-8 In order to protect our rights, however, we have prepared a list of our concerns regarding the DEIR document and the impacts of this project. The Broadway Junction and the path of the gondola directly over our 100+ year old neighborhood would have an enormous impact on our lives.

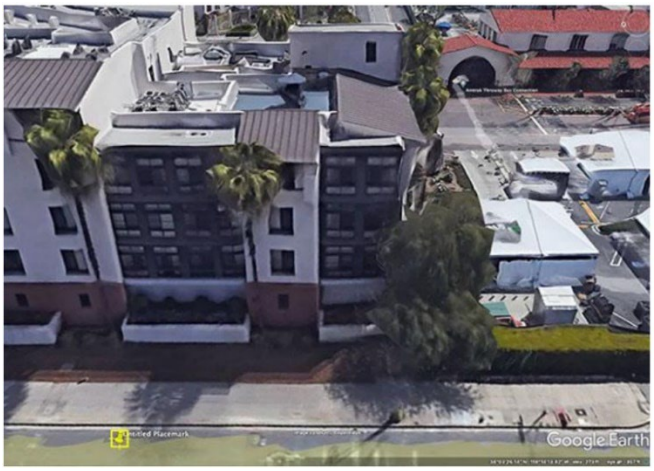
Response P702-8 This comment provides a general introduction to the comments raised in this letter. Responses to the remaining comments contained in this letter are provided below in Responses P702-9 through P702-134.

Comment P702-9 Invasion of Privacy

The DEIR should explain how the proposed "smart glass" would work, how much it would cost, whether it is feasible or cost prohibitive to maintain, and how would it be implemented. For example, when/where along the route does the glass get activated and which windows are activated at each location? We believe the questions of when the smart glass would be activated should be answered along the entire route, especially where the gondola passes near residences including Mozaic Apartments, Metro Lofts, the future College Station development, Blossom Plaza, and the neighborhoods around Cottage Home Street and Savoy Street.

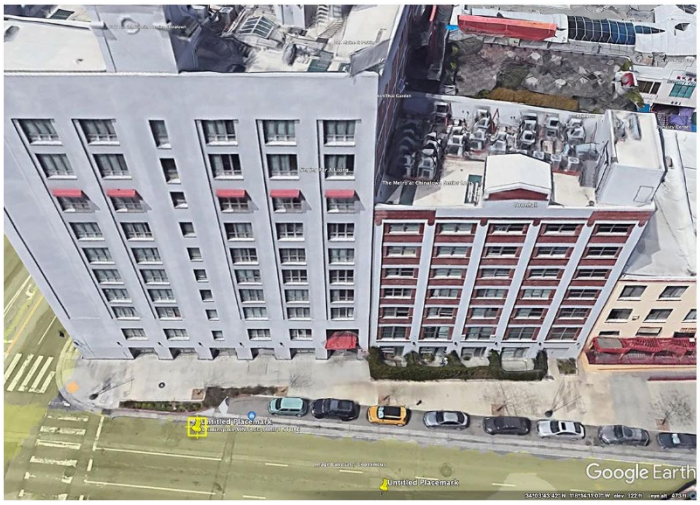
Response P702-9 Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Comment P702-10 The following pages are Google Earth images along the gondola route at the approximate height of the gondola cabins:



Google Earth View of Mozaic Apartments, 84 ft above ground

Google Earth View of Metro Lofts from 151 ft above ground, facing north



Google Earth View of Metro Lofts from 151 ft above ground, facing west

Google Earth View of Broadway Junction Site, view from 45 ft above ground

The following two images are Google Earth images in the neighborhood of the Broadway Junction, on Savoy Street. The images are much higher than the views that passengers would see from the cabins. Google Earth did not have view available at the height of the gondola cabins.

Google Earth Eye view at Broadway Junction Site, Approximately 65ft above ground. This is 20 ft higher than the view from gondola cabin (could not go lower on Google Earth).

Google Earth Eye view at Broadway Junction Site – Approximately 65ft above ground. This is 20 ft higher than the view from gondola cabin (could not go lower on Google Earth).

Response P702-10 As the commenter notes, the Google Earth images are approximations and do not accurately reflect views from the proposed Project's cabins. Refer to Appendix A, KOP Figure Mapbook, to Appendix C, Visual Impact Assessment, of the Draft EIR, for visual simulations of "key observation points" ("KOPs") of the proposed Project, including visual simulations of the views from proposed Project's cabins in KOPs 28a and 28b. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project.

Comment P702-11 If the "smart glass" malfunctions, will video cameras inside the gondolas record views of our private yards and through windows? We are relying on a private company to keep this system in good working order, and do not want to be inadvertently surveilled.

Response P702-11 As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, each cabin would have a security camera on board with feed to a control room. Routine cabin maintenance would be performed by the system operator. The use of security cameras in the cabins is consistent with Metro's use of security cameras on its public transit systems. The security cameras used in cabins can be selected to balance the need for monitoring and recording activity inside the cabins with minimizing recording the details of activity outside of the cabins, including on private property. In addition, the security cameras in each cabin could be angled to minimize the area outside of the cabin that is captured in the recording, similar to the angle of cameras in Metro's buses shown in this image:

[24]

While inapplicable to the proposed Project, Metro's Records Management Policy prohibits Metro from releasing video camera surveillance recordings to the public, which may only be viewed by authorized Metro employees, and by law enforcement, upon request.[25] Similarly, the Emergency Operations Plan for the proposed Project would include policies and procedures so that the video recordings from the proposed Project's cabin security cameras are not releasable to the public and only viewable by authorized employees, and by law enforcement, upon request to designated system safety and security personnel.

Comment P702-12 We are concerned and skeptical about the ability of the battery charging system of the gondola cabins to maintain power to all of the proposed systems in the cabins that require electricity. To our knowledge, the systems that will run off of the cabins' battery power include the security cameras, WIFI for video streaming and audio communications, lighting, smart glass, air circulation/ filtration, seat heating, and air

[24] Garcia, Sid. 2014. Metro buses get multi-camera video surveillance systems. Available at: https://abc7.com/metro-bus-video-recording-camera-system-surveillance-cameras/143396/. Accessed September 2023.See also Los Angeles County Metropolitan Transportation Authority (LA Metro). 2020. Public Transportation Agency Safety Plan. Available at: https://libraryarchives.metro.net/DB_Attachments/200401_Attachment%20B%20-%20PTASP.pdf. Accessed September 2023.

[25] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2010. Records Management Policy.

conditioning (which at the October 22, 2022 Zoom DEIR meeting was said to be "anticipated"). Here are some of our questions related to the electrical in-cabin systems that we hope will be addressed in the next draft of the EIR:

Response P702-12 This comment provides a general introduction of comments P702-13 through P702-15. Responses P702-13 through P702-15 are provided below.

Comment P702-13 Will the smart glass be the first system to be sacrificed if the battery power drops below a certain level? How often could this happen? Would this be likely to happen during heat waves due to the electrical load from the air conditioning system?

Response P702-13 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, for discussion of how power for the proposed Project cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment. The power in each cabin would supply the cabin amenities, which require electrical power in all anticipated temperatures.

Comment P702-14 How much energy does the air conditioning draw at various outdoor temperatures, and at what outdoor temperatures would The Gondola system be required to shut down for safety reasons?

Response P702-14 Refer to Response P702-13 for discussion of cabin power. The proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts.

Comment P702-15 According to LA ART, the batteries powering the gondola cabins would be recharged mechanically via wheels that are attached to the gondola cabins, turning on the track ropes. We ask that LA ART explain in the EIR how this recharging system works. Realistically, how much energy can be generated from the wheels?

Response P702-15 Refer to Response P702-13 for discussion of cabin power. Refer to Topical Response J, Gondola Design and Operations, for discussion of how power for the proposed Project cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment.

Comment P702-16 How does The Gondola affect our rights to privacy on our private property? There are certain rights that individuals have on private property that they do not have in public. Will the privately owned gondola guideway in the air be deemed a public right-of-way? What is the legal framework for protecting residents' privacy rights on their private property when a private project invades it like this? These include the rights to not be video recorded. Do we lose these rights to privacy on our private property

if the smart glass is malfunctioning? Are residents restricted in terms of messages and signage on their private property that can be seen from The Gondola, but is not visible from our public streets?

Response P702-16 The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses. As discussed in Topical Response M, Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. The applicable legal framework is consistent with this practical reality of modern urban life, and the proposed Project would not affect any privacy rights on private property. There is no applicable state or federal statute governing privacy rights between private parties in the land use context. And the United States Supreme Court has said, in analogous situations, that there is no reasonable expectation of privacy in this type of context. As discussed in Section 2.0, Project Description, of the Draft EIR, an objective of the proposed Project is to maximize the proposed Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over properties. To the extent that the proposed Project is in proximity to private properties, it does not infringe on the reasonable expectation of privacy of these private property owners. And, as discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, the Project Sponsor would seek discretionary entitlements, reviews, and approvals from Caltrans, State Parks, the City, and Metro to establish and authorize aerial rights for the proposed Project, as well as any agreements required with private property owners for aerial rights for portions of the proposed Project that are not over public ROW or publicly-owned property. Refer to Response P702-9, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Refer to Response P702-11 for discussion of how the proposed Project would include security cameras and would implement video privacy and retention measures. The proposed Project would not impose restrictions on residents in terms of messages or signage on their private property.

Comment P702-17 Noise / Vibration

Many homes in our neighborhood are over 100 years old and don't have soundproofing. Homes have plaster walls and single pane windows. And as mentioned in the visual impacts analysis, many of our homes have security bars on the windows. Many of our homes were built before air conditioning existed – with plaster walls, high ceilings, and basements that help keep our homes cool in the summer. We don't have air conditioning or can only afford to use it sparingly, and need to leave windows open at night in the summer for cooling. With the added noise and disturbance of this project, you will force many of us to keep our windows closed and use air conditioning, which is not an environmental benefit of this project.

Response P702-17 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would maximize the alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties. As shown in Table 3.13-26 on page 3.13-58 of the Draft EIR, operational noise impacts of the proposed Project would be less than significant. Refer to Responses GO17-129 and Response GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. As noted on page 2-51 in Section 2.0, Project Description, of the Draft EIR, construction activities would be limited to daytime hours, pursuant to the Los Angeles Municipal Code. Therefore, the proposed Project would not result in nighttime construction impacts.

Comment P702-18 The DEIR states that the maintenance of The Gondola system will be at night, between midnight and 6am. This will create significant noise that is not included in the noise analysis. Would power tools be required to service the Broadway Junction? If so, it could sound like an open-air auto mechanic's shop in our neighborhood at night. Would we hear workers shouting at each other? We are not aware of any urban gondola systems that place open-air stations in the middle of residential neighborhoods. We believe the Broadway Junction needs to be redesigned to be a fully enclosed non-passenger station.

Response P702-18 Like the Broadway Junction, most standard aerial gondola stations are designed to be open and cannot be fully enclosed, as the ropes and cabins are required to pass through the building. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how maintenance would include observation of the overall system as part of the startup routine for system safety. Maintenance for the proposed Project would include maintenance of cabins, daily inspections, minor repairs, and major repairs. The proposed Project cabins would be primarily serviced overnight at the subterranean cabin maintenance area below the Dodger Stadium Station. Maintenance activities in the Broadway Junction are expected to be limited primarily to maintenance of the Broadway Junction itself and would include daily inspections, minor repairs, and major repairs. Daily inspections would be conducted by the system operator and would not be associated with any noise generating equipment. Periodically, minor repairs may be needed based on these daily inspections. Work associated with minor repairs would be limited. Any major repairs to or replacement of large capital equipment at the Broadway Junction would be performed during planned outages and would occur on an infrequent basis. For instance, the drive motor is estimated to have a ten-year or greater life cycle and would be replaced as part of a planned outage. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations

demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Such comparable aerial transit systems include open air stations in residential areas.

Comment P702-19 The noise and vibration analysis is vague and flawed. For example:

- Noise measurements were conducted between June 15 and June 18, 2020 – during the COVID-19 pandemic stay-at-home orders when traffic was light. As acknowledged in the DEIR, this underestimates the noise measurements that established the baseline or existing noise in the neighborhood, which in turn, underestimates the total noise once The Gondola Project's noise is added to the existing noise. It's quite possible that the operational noise at NSR-17 would be pushed above the unacceptable levels for single family homes on Savoy Street once this correction is made.

Response P702-19 As discussed on page 3.13-18 of Section 3.13, Noise, of the Draft EIR, "during the time when the noise measurements were conducted for this analysis (June of 2020 for all measurements except ML-22, which was conducted on May 11, 2022), local traffic volumes were anticipated to be somewhat lower than normal due to COVID-19 pandemic restrictions. While no comparative traffic data was available to confirm this observation, an informal comparison of measured noise levels to previously measured noise levels for other technical studies in similar locations during pre-COVID conditions show that the previously measured noise levels were up to 3 dBA higher. As such, as discussed on page 3.13-19, measured ambient noise levels represent a conservative noise impact assessment.

A lower ambient noise measurement results in a conservative assessment because noise is measured using the dB scale, which is logarithmic, not linear, and therefore sound levels are not added or subtracted through ordinary arithmetic. For instance, two sound levels 10 dB apart differ in acoustic energy by a factor of 10. An increase of 10 dBA is generally perceived as a doubling in loudness. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions.[26] Alternatively, the proposed Project would need to generate a noise level equal to ambient conditions to result in a 3 dBA increase, and the proposed Project would need to generate a noise level greater than ambient conditions to result in a greater than 3 dBA increase in noise. Therefore, the use of a lower ambient measurement would reflect a greater increase in noise from proposed Project operations. Put another way, for the same noise source the increase over ambient is larger when compared to a lower ambient. When that same noise source is compared to a higher ambient, the increase over ambient will be smaller. Since noise is analyzed as an

[26] Federal Highway Administration (FHWA). 2017. Noise Fundamentals. Available at: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm. Accessed August 2023.

increase over ambient conditions use of a lower ambient results in a more conservative analysis. For instance, with respect to the CNEL analysis, as shown in Table 3.13-11 on page 3.13-20 of the Draft EIR, the ambient noise level at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR-17S (Low-Rise Residential - South (on Savoy Street)) is 59.3 CNEL. As shown on Table 3.12-22 on page 3.13-54 of the Draft EIR, combined operational noise from the proposed Project would be 58.9 CNEL at NSR 17N and NSR-17S, resulting in an ambient plus project level of 62.1 dBA CNEL, which is an increase of 2.8 dBA and less than the 5 dBA allowable increase.

As discussed above, measured noise levels for other technical studies in similar locations during pre-COVID conditions show that the previously measured noise levels were up to 3 dBA higher (Page 3.13-18 of the Draft EIR). Assuming that ambient noise at NSR 17N and NSR-17S is 3 dBA higher than what was measured (59.3 + 3 = 62.3), the Project would result in a lower increase of 1.6 dBA versus 2.8 dBA. Both conditions would remain below the 5 dBA allowable increase. Accordingly, if a higher ambient had been used the Project would not result in the exposure of NSR 17N or NSR-17S to unacceptable noise levels. In fact, the analysis shows that if a higher ambient had been used the increase over existing would have been lower. As such, the lower measured ambient noise levels represent a conservative noise impact assessment and the use of a lower ambient noise level in the analysis would not result in unacceptable noise levels.

Comment P702-20 Another NSR location at 455 or 451 Savoy Street should be included in the noise analysis because this is where the noise from the Broadway Junction may be the highest in the neighborhood during operation of The Gondola, according to the Rossi model. The construction noise would also be higher at 455 or 451 Savoy than at NSR-17N because there are no structures between these two locations.

Response P702-20 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, a noise survey was conducted to establish existing noise conditions in a variety of locations throughout the proposed Project area, focusing on areas of existing or future noise-sensitive receptors, including single-family residential (SFR) areas, multi-family residential (MFR) areas, parks, schools, and other outdoor areas of frequent human use. In the area of Savoy Street, measurements were taken at ML-20 (430 Savoy Street) to establish existing ambient noise levels. As explained on page 3.13-18 of the Draft EIR, ML-20 is representative of other noise-sensitive receptors located further from busy streets. The existing ambient noise levels from ML-20 were then used to evaluate noise impacts at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR 17S (Low-Rise Residential South (on Savoy Street)). Accordingly, NSR 17N was selected as a representative sensitive receptor for all the residential on Savoy Street to the north and therefore includes both 455 and 451 Savoy Street. As demonstrated in Response P702-19, the use of a lower ambient noise level as the basis of the analysis is conservative. ML-20 is located further from Broadway and Bishops Road, resulting in lower ambient measurements

than if noise was measured along the roadway. Accordingly, use of ML-20, which is located further from Broadway and Bishops Road results in a conservative analysis for NSR 17N and NSR 17S. NSR 17N and NSR 17S show the range of impacts that would occur on Savoy Street. This representative analysis was conducted instead of establishing existing ambient noise levels and modeling impacts at approximately 14 different residential uses along Savoy Street. The construction and operations analysis at NSR 17N and NSR 17S shown in the Draft EIR at Tables 3.13-17, 3.13-18, 3.13-22, 3.13-23, 3.13.24, and 3.13-25 provides the range of impacts that would occur to sensitive uses along Savoy Street including both 455 and 451 Savoy Street. Accordingly, NSR 17N and NSR 17S are representative sensitive receptors for all the residential on Savoy Street, including 455 and 451 Savoy Street.

Comment P702-21 These noise measurements in our neighborhood on Savoy Street were taken at 430 Savoy Street. This location may underestimate the noise from the 110 FWY because the property is partially shielded from the freeway noise by the elevated terrain of Radio Hill. We suggest an additional measurement location at 455 Savoy Street or across the street from that address on Savoy Street.

Response P702-21 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, NSR 17N (Low-Rise Residential – North (on Savoy Street)), as shown in Figure 3.13-5, Noise Sensitive Receptor Map, on Page 3.13-21 of the Draft EIR, encompasses 455 and 451 Savoy Street. Therefore, impacts have been addressed at 455 and 451 Savoy Street. As demonstrated in Response P702-19, the use of a higher ambient noise level would result in a lower Project impact. The use of a lower ambient noise level as the basis of the analysis is conservative and is not an underestimation of impacts. Pursuant to the LA CEQA Thresholds Guide, noise impacts would occur if project construction or operation would be greater than 5 dBA over ambient conditions (threshold = ambient + 5 dBA). The use of a potentially lower ambient noise level in the analysis of NSR 17N would result in lower thresholds; as such the analysis is conservative.

Comment P702-22 The noise analysis does not identify by name the gondola system that was measured for reference, only noting that the system is in Austria and can be found in Appendix A.

Response P702-22 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As provided therein, the reference noise levels in Appendix L, 3S Sound Measurements Memo, of the Final EIR were taken in Tyrol, Austria at the Stubai Glacier. The system is known as the Eisgratbahn gondola.

Comment P702-23 The noise analysis does not identify differences between the 3S gondola system in Austria that was measured and The LA ART Gondola project that is proposed. The analysis does not make any adjustments to the estimated sound levels of The Gondola to account for these differences. The analysis makes the assumption that the sound

power parameter, Lwsf, for the 3S gondola in Austria, The Koblenz Seilbahn, is the same as that for the proposed LA ART Gondola, and that the same parameter can be used for intermediate, angle/junctions, and end stations. We have the following questions about their estimate of LA ART's operational noise:

Response P702-23 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project and an explanation of how the noise model equations were validated by measurements from the Tyrol 3S gondola system, which is similar to the proposed Project. The Tyrol 3S gondola system used for validation includes similar system mechanics as the Broadway Junction; specifically, it includes an above-ground drive motor and bullwheel as well as a return bullwheel. The assumptions in the Draft EIR conservatively reflect noise associated with both a drive bullwheel and a return bullwheel at all station and junction locations. In addition, the Tyrol 3S system was operating at the same speed as the proposed Project at 6 meters/second and has a similar cabin capacity. Accordingly, no adjustments were needed to utilize the Tyrol 3S gondola system for validation.

Comment P702-24 Were the measurements taken from the gondola station in Austria taken from a station that included the drive motor or was it taken from one with a passive bullwheel? Where the measurements taken while the gondola was operating at maximum capacity?

Response P702-24 Refer to Topical Response P, Gondola System Noise Modeling, and Response P702-23, for discussion of the noise model used to predict noise levels from operations of the proposed Project including an explanation that the Tyrol 3S gondola system used for validation includes an above-ground drive motor and bullwheel as well as a return bullwheel at the station where noise measurements were taken. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. As noted on page 3.13-27, this analysis assumed that the gondola cabin was operating with 40 people inside, which is the maximum cabin capacity. Based on this assumption, as provided on pages 3.13-57 and 3.13-58 of the Draft EIR the impacts from gondola cabin noise would be less than significant. Accordingly, the Draft EIR added an analysis that accounted for a maximum cabin capacity in addition to the passengers that may have already been included in the underlying equations and measurements.

Comment P702-25 Is the drive motor for The LA ART Gondola underground, like the gondola in Austria?

Response P702-25 Refer to Topical Response P, Gondola System Noise Modeling, and Response P702-23, for discussion of the noise model used to predict noise levels from operations of the proposed Project including an explanation that the analysis conservatively used

equations associated with an underground gondola system because the sound power levels of the underground gondola system were higher than the tensioning system. The Tyrol 3S gondola system used for model validation includes an above-ground drive motor and bullwheel as well as a return bullwheel, similar to the proposed Project's Broadway Junction.

Comment P702-26 What are the differences in characteristics between the reference drive motor and The Gondola's drive motors that may impact noise levels and vibration? Does the capacity of the gondola system impact the sound power parameter, Lwsf? If the system in Austria is the Koblenz gondola, that system has a much lower capacity.

Response P702-26 Refer to Topical Response P, Gondola System Noise Modeling, and Responses P702-23 and P702-24, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As discussed therein, the Draft EIR's assessment of noise impacts does not utilize noise data from the Koblenz 3S system. Instead, the model was validated with the Tyrol 3S gondola system which has a cabin capacity similar to the proposed Project. Refer to Response P702-24 for discussion of how the Draft EIR noise analysis included an evaluation of the maximum capacity of cabins.

Comment P702-27 In the noise analysis, it states that one of the assumptions is as follows: "The proposed Project includes one junction. The junction is a non-passenger junction used to execute a turn in the ropeway (while the junction includes vertical circulation elements, which are for maintenance). Acoustically, it was assumed that the junction would have the same power unit as the stations and was modeled using the same equations and parameters as the stations." We don't believe this is a good assumption. The junction and intermediate stations contain twice as many components for circulating the cabins. In addition, the Broadway junction contains both a motor unit and a tensioning system.

Response P702-27 Refer to Topical Response P, Gondola System Noise Modeling, and Responses P702-23 and P702-24, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As explained therein, the assumptions in the Draft EIR conservatively reflect noise associated with both a drive bullwheel and a return bullwheel at all station and junction locations.

Comment P702-28 What are the differences in the build and natural environment of the reference gondola and The Gondola that is proposed that would impact the propagation of sound from this system? If the reference system is the Koblenz gondola in Austria, that system is surrounded by a flowing body of water and open space that may diffuse, scatter, or absorb noise. However, the alignment of The LA ART Gondola is in an area that is undergoing redevelopment and will likely see further midrise and high-rise developments in the next 40 years. Future development along Alameda Street could propagate the noise from The Gondola's Alameda Station and Chinatown State Park Station via a well-known "urban canyon effect."

Response P702-28 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As explained therein, the Draft EIR's does not utilize noise data from the Koblenz 3S system; the Draft EIR model was validated based on the Tyrol 3S system. Because the Tyrol system is not located in an urban environment and is instead located in the Alps, the measured noise source from the system was not influenced by other noise sources and nearby buildings reflecting surface. Therefore, it is easier to isolate the noise from the 3S system in Tyrol.

The comment also raises concerns regarding the potential for a future "urban canyon effect." CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. Nevertheless, an examination of potential future "urban canyon effects" was conducted for informational purposes. In outdoor noise evaluations the "urban canyon effect" occurs where there are sound reflective surfaces in close proximity to the noise source. For instance, if there were rows of high-rise buildings located along the proposed Project alignment it could contribute to an increase in noise levels due to sound reflection. Currently, there are no high-rise buildings, continuous or in parallel, along the proposed Project alignment that may cause an "urban canyon effect" based on the review of the proposed Project alignment and current building layouts; the tallest building along the proposed Project alignment is a 10-story building at the corner of Alameda Street and Alpine Street. All other buildings are 6-stories or less. A 10-story building is lower than the elevation of ropeway (approximately 175 feet above ground). Furthermore, based on review of the related projects discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, there are two proposed related projects with high-rise buildings (up to 26 stories). However, these proposed 26-story buildings are not parallel with any other high-rise buildings. Therefore, potential noise impacts associated with an "urban canyon effect" would not occur. Nevertheless, a 3-D acoustics model was created to evaluate the potential noise increase assuming there would be a new high-rise building (taller than the gondola ropeway) along the proposed Project alignment that have not yet been considered or proposed.[27] Based on the analysis, in the event that there are new high-rise buildings located along the proposed Project alignment, an estimated noise increase of approximately 1.3 dBA due to the canyon effect could occur. However, the estimated noise increase would not result in a significant impact.

Comment P702-29 We suspect that one or more of the large trees between our neighborhood (on Savoy Street) and the 110 FWY will need to be removed due to the height of the trees interfering with the path of the gondola cabins. The EIR needs to confirm whether any trees will be removed or pruned, and account for increase in freeway noise in the neighborhood due to the removal or modification of trees for this project.

[27] Acoustical Engineering Services (AES). 2023. Noise Calculation Worksheets, Urban Canyon Effects Calculations.

Large Trees Potentially in the Path of The Gondola Cabins/Cables Between 455/451 Savoy and SR-110 (110 FWY)

Large Trees East of SR-110 Northbound Lanes, Inside the Onramp Loop

Response P702-29 The Tree Inventory Report, included as Appendix B to Appendix E, Biological Resources Assessment, of the Draft EIR, details the number and types of trees along the proposed Project alignment. As discussed in Appendix K.1, Updated Tree Report, in response to comments on the Draft EIR, the Tree Inventory Report prepared for the proposed Project has been updated to clarify the criteria for inclusion in the report's inventory, as well as to remedy certain counting errors. The overall number of inventoried trees and number of protected trees required for removal remain the

same as the original Tree Inventory Report, and the overall numbering for trees within the inventory remains the same. As shown in the Tree Location Exhibit (Exhibit A) and detailed in Table 7 of the Tree Inventory Report, a total of 8 trees are located within the portion of the proposed Project alignment over SR-110. Of those 8 trees, 5 will be removed (tree # 131-132, 136-138) and 3 will be preserved (# 133-135). The tree shown in the first and third photos is tree #134, which will be preserved, and the tree shown in the second photo is tree #138, which will be removed. Noise sensitive receptors along Savoy Street (NSR 17N, NSR 17S) are located approximately 465 feet from the SR-110 mainline. According to the California Department of Transportation Technical Noise Supplement,[28] it is uncommon for noticeable noise reduction to be achieved with trees and vegetation (Section 2.1.4.4) with Caltrans research indicating that landscaping along highways account for less than 1 dBA of reduction. Although trees and vegetation can contribute to noise reduction, the effectiveness of tree barriers vary based on the density and width of vegetation. Reductions of 6 to 10 dB can be achieved where a dense belt of trees combined with shrubs are 15 and 30 meters wide (approximately 50 to 98 feet wide) and reductions of 5 to 10 dB can be achieved with a dense belt of trees only (with no shrubs providing ground cover) between 15 and 30 meters wide (approximately 50 to 98 feet wide).[29] Based on an aerial view of the area within the SR-110 NB on-ramp loop, the tree canopy width between the 110 and NSR 17N and NSR 17S is approximately 16 meters (55 feet) wide at this location and are not of sufficient density or width to effectively reduce noise from SR-110 for the noise sensitive receptors along Savoy Street (NSR 17N, NSR 17S). Due to the distance and sparseness of the vegetation the depicted vegetation is not anticipated to provide appreciable reductions in traffic noise from the SR-110 and the removal of trees #131-132 and #136-138 would not result in increased ambient noise at NSR 17N or NSR 17S.

Comment P702-30 Even with mitigation, the construction noise at NSR-17S is estimated at 80 to 90dB without mitigation and approximately 70-80dB with mitigation. This is outrageous.

Response P702-30 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts for the proposed Project at Broadway Junction. Implementation of Mitigation Measure NOI-A would be required to minimize impacts during all construction phases at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR 17S (Low-Rise Residential – South (on Savoy Street)); however, construction impacts at NSR 17N and NSR 17S would remain significant and unavoidable during all construction phases. As provided by Mitigation Measure NOI-A, for the entire duration of construction of Broadway Junction, the proposed Project would provide a 24-foot temporary noise barrier between the construction site and NSR 17 (Low Rise Residential), in addition to NSR 13 (Future

[28] California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol Section 2.1.4.4. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed August 2023.

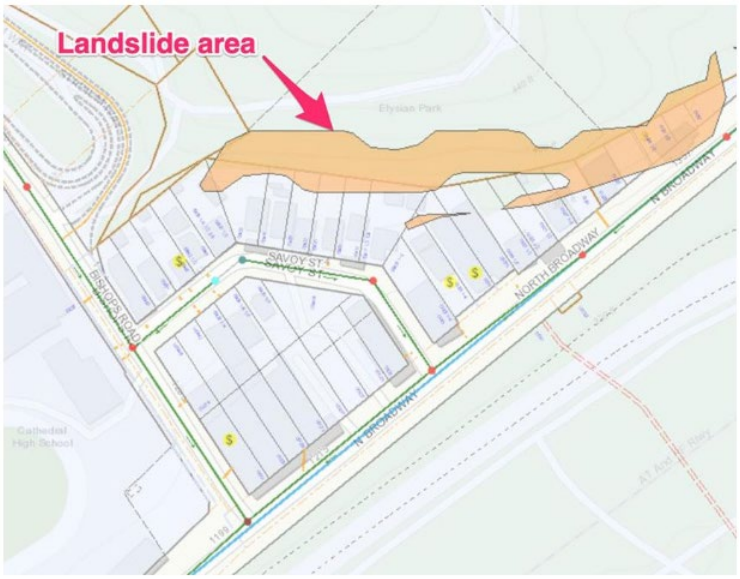
[29] Dobson, Martin & Jo Ryan. 2000. Trees & Shrubs for Noise Control. Available at: https://www.trees.org.uk/Trees.org.uk/files/8c/8c69f212-a82e-424b-96d1-c8ff6dc02403.pdf. Accessed March 2023.

Development), NSR 14N (Los Angeles State Historic Park - North). In addition, during a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities at Broadway Junction. While the temporary platforms are installed, the proposed Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the construction site and NSR 17, in addition to NSR 13, NSR 14N, and NSR 16.

Comment P702-31 The vibration caused during construction of the Broadway junction's foundation may cause damage to our homes. There are also retaining walls in our 100+ year old hillside neighborhood that were build prior to current building codes that may be damaged and cause instability to our hillsides. Most of the properties on the west and north side of Savoy Street are in a landslide area. We are concerned that the Radio Hill hillside could become unstable during construction of the junction and trigger a landslide.

Response P702-31 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, construction activities at the Broadway Junction would not exceed the vibration damage thresholds at any vibration-sensitive receptors, and the impact would be less than significant for building damage. Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of the potential for landslides withing City-designated hillside areas. As discussed on page 3.7-17, the proposed Project would be constructed in accordance with applicable standards, requirements, and building codes. Mitigation Measure GEO-A requires the preparation of a site-specific geotechnical investigation and report which would include geotechnical recommendations for project design and construction based on grading conditions and foundation capacities, and recommended measures such as site stabilization to reduce potential impacts related to potential ground failures induced by the proposed Project. With compliance to existing standards and codes and implementation of Mitigation Measure GEO-A, impacts related to unstable soils, landslides, lateral spreading, subsidence, liquefaction, or collapse during construction of the proposed Project would be reduced to less than significant.

Comment P702-32



Landslide Area Near the Broadway Junction (NavigateLA)

We are also concerned that vibration from construction on the Broadway Junction could cause structural damage to our old infrastructure including sewer pipes, sewer laterals, water mains and gas lines. The sewer lines under Savoy Street were installed in 1896 and 1906. Two spot repairs were made on the sewer pipe along Broadway in 2008. We did not see this impact addressed in the DEIR.

Response P702-32 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, construction activities at the Broadway Junction would not exceed the vibration damage thresholds at any vibration-sensitive receptors, and the impact would be less than significant for building damage. The maximum level of vibration of 0.59 inches per second (in/sec) peak particle velocity (PPV) is considered the maximum level of intermittent or transient vibration acceptable for old underground services/buried pipework.[30] The analysis in the Draft EIR shows that the highest project construction vibration levels associated with construction of the Broadway Junction at VSR-17 (Low-Rise Residential (on Savoy Street) (includes 451, 437, and 438 Savoy Street) would be 0.17 in/sec PPV at 438 Savoy Street (Table 3.13-28 on page 3.13-63). 0.17 in/sec PPV is well below the maximum acceptable level for old underground services/buried pipework. As construction vibration is well below the acceptable level for old underground services/buried pipework, structural damage to infrastructure including sewer pipes, sewer laterals, water mains and gas lines would not occur from proposed Project construction. Additionally, the City of Los Angeles has a proactive and preventive maintenance program for its sewer

[30] NZ Transport Agency. Assessment of Environmental Effects for the Basin Bridge Project, Wellington Northern Corridor RoNS. Available at https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000026/Applicants-proposal-documents/5f29d30124/AEE-Chapter-16.pdf. Accessed August 2023.

system that responds to and prevents potential damage.[31] Therefore, construction on the Broadway Junction is not anticipated to damage existing utility infrastructure.

Comment P702-33 Measurements taken in the Savoy Street neighborhood were taken at 430 Savoy Street, which is partially shielded from the 110 FWY noise by the upslope of Radio Hill behind the homes on Savoy Street. Residences closer to Bishops Road may experience slightly higher freeway noise. A better measurement site, where the maximum noise would be highest in the neighborhood would be at Bishops and Savoy Street.

Response P702-33 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, noise measurement locations were selected to represent noise-sensitive receptors (see Draft EIR Section 3.13.3.1, Existing Noise Conditions). The noise measurement locations were selected to represent ambient conditions at the noise-sensitive receptor locations along the proposed Project alignment. Noise measurement locations were selected to attain the ambient levels and avoid influence from other sources (including roadway noise freeways) in order to avoid artificially increasing ambient levels. The measurement of ambient noise at a major roadway intersection would inaccurately reflect the ambient noise levels for residences located further from the intersection. Refer to Response P702-19 for discussion of how the use of a lower ambient noise level as the basis of the analysis is conservative.

Comment P702-34 We request that these issues be clarified and investigated in relation to the noise and vibration analysis: In addition, the City and other agencies should be looking for ways to help our communities reduce the noise in our neighborhoods that is a result of the freeway traffic and historical redlining, instead of introducing additional sources of noise that nudge us closer to levels that are incompatible with residential land use.

Response P702-34 This comment provides a general conclusion regarding the noise and vibration comments raised in Comments P702-17 through P702-33. Responses to the noise and vibration comments contained in this letter are provided in Responses P702-17 through P702-33. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential uses.

Comment P702-35 Safety/Security

Because there is still no funding plan and no operation plan, we are concerned that this system will not be properly maintained and secured by this private operator. We

[31] City of Los Angeles. 2015. Sewer System Management Plan. Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M216.pdf. Accessed August 2023.

are concerned about the cavalier attitude with which LA ART is approaching the challenge of maintaining and securing this system. LA ART does not acknowledge the risks that are being imposed on residents, users of this system, and the general public in right-of-ways under The Gondola.

Response P702-35 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer also to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Routine cabin maintenance would be performed by the system operator. System components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, operators would be present at each station and in control rooms to monitor activity throughout the proposed Project.

Comment P702-36 We are concerned about harm that could be caused by vandalism or sabotage of the system, as happened with the Sea to Sky Gondola. The operators of that gondola had to completely revamp their security after a vandal cut their cable on two occasions in just over a year. The operators admitted that security cameras are worthless if no one is monitoring them. How many security cameras will be used to monitor the LA ART Gondola system, and how many people will LA ART employ to monitor all of these security cameras? Will they be monitored 24/7 to prevent acts of sabotage? How much staff will really be needed to operate and maintain this system? The cables of gondola systems are very thick steel; a falling cable could kill a person, as almost happened in the Sea to Sky Gondola case (https://unofficialnetworks.com/2022/09/15/sea-to-sky-reward-doubled/). This is a huge concern for residents who would live under the gondola's path.

- https://www.cbc.ca/news/canada/british-columbia/sea-to-sky-gondola-vandalism-update-2022-1.6582667" Operators of the gondola stepped up security after the cable was cut the first time and the attraction now has an in-house security team with tech for around-the-clock surveillance."
- https://vancouversun.com/news/local-news/security-company-sued-in-connection-with-sea-to-sky-gondola-vandalism "They say USI assured them it would equip the system with sufficient cameras and equipment so as to provide coverage of all of the gondola's towers to detect unauthorized access and which would trigger an alarm in the event of a vandal approaching the scene."…"As a result of the security breach and the alarm failure, the vandal was able to sever the cable, which parted catastrophically. The loss event caused substantial damage and destruction to the gondola and its components."
- https://www.squamishchief.com/local-news/sea-to-sky-gondola-to-reopen-with-own-security-team-3839149
    - Brown said having an in-house security team makes a significant difference.
    - "You can have the highest tech stuff on the planet, but if you don't have a team that's constantly attuned to what that information is telling you about your situation, then it's not really worth a lot," he said.
    - It's essential to have security personnel familiar with local topography, the community, and how circumstances change according to time of day and seasons, he said.
    - "I can't tell you how many security cameras out there that are recording footage that nobody ever watched," said Brown. "You need to be alive to the situation minute-by-minute. And that takes people that care about it. And that's the difference, right there…we now have a team whose – not just their hob – but… passion is looking after the Sea to Sky Gondola."
- The vandal still has not been caught. All they have is a blurry thermal image. This suggest that better lighting is needed for security, which may impact light pollution.

Response P702-36 In British Columbia, Canada, the Sea-to-Sky Gondola experienced vandalism on two occasions when an individual deliberately severed the system cable. While no injuries were reported from either incident, both of which occurred outside of operating hours, there was equipment damage. While vandalism is not unheard of in aerial transit, it is highly uncommon. Moreover, the scale of the damage to the Sea-to-Sky Gondola is an exception in the industry and makes clear that the incident was carried out by an individual with clear intention to cause such damage. The individual would have had to know the terrain well enough to traverse it at night, be physically fit, be equipped with powerful tools, and possess the ability and knowledge to use these tools to sever the cable without harming themselves. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers will be secured at all times and only accessible by authorized personnel. The system components will be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment P702-37 We are also concerned about the security inside the gondola cabins for users of the system. What kind of liability will this create by packing every gondola cabin full with 40 people for a full two hours before and after every Dodger Stadium game and event? Will the capacity need to be reduce to better manage security? If so, this could drastically change the estimates of GHG emissions reductions. According to a report from the City of Gothenburg, "When catastrophic accidents occur, such as that in

Singapore, it is generally a result of third parties who failed to adhere to policies and/or who were negligent. This suggests that while a cable car operator can implement policies and procedures to safeguard a cable car, operators must also be proactive and engage with all relevant stakeholders."

(https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport best-practices.pdf). Also, "However, since each city has its own unique security circumstances, the city should conduct extensive consultations with relevant local stakeholders. This may determine the level of risk that could be anticipated aboard a cable car and in turn, inform the security settings required on a cable car to make passengers feel safe." This is why we question LA ART's commitment to safety and security when they claim that The Gondola will be safe because they will follow all applicable regulations and safety protocols. There is a well documented history of fights at Dodger Stadium and in the parking lots.

- "Jaime was knocked unconscious as another man punched him in the face. Jaime, who is a grandfather, said he and his wife were leaving the Elton John concert when someone in a group smacked his rearview mirror. According to the grandfather, when he got out of the car to ask, a woman punched him shortly before other men started beating him."https://www.cbcnews.com/losangeles/news/lapd-promising-more-arrests-in-beating-of-couple-outside-elton-john-concert-at-dodger-stadium/
- "Rafael Reyna's Los Angeles Superior Court lawsuit alleges negligence, premises liability, assault, battery and intentional infliction of emotional distress. He maintains lighting was poor and security was lacking at the 2019 game." (https://kfiam640.iheart.com/featured/la-local-news/content/2022-05-17-dodgers-want-proof-of-beating-victims-wifes-emotional-distress-claim/)
- "Filed in Los Angeles Superior Court, the suit notes Dodger Stadium has a higher crime rate than any other ballpark. This is not the first time the team has come under legal proceedings due to security issues. A civil trial of Giants fan Bryan Stow, who was brutally attacked outside of the stadium in 2011, resulted in a judgement against the team in 2014." (https://dodgersway.com/2020/04/24/dodgers-news-fan-sues-team-over-2019-beating-at-dodgers-stadium/).
- In August 2021 there was a peak in violence at Dodger Stadium, mostly related to assaults and alcohol. (https://xtown.la/2021/09/22/dodger-stadium-crime/).
- The Gondola project needs a security plan that is custom designed for the elevated security risk at Dodger Stadium after a game or event. 2022 was another record year (https://xtown.la/2022/12/09/crime-unusual-places-golf-course-cemetery-dodger-stadium/)

Response P702-37 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed

Project is equipped with security features. Attendants would be present at each station, and a separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. To provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. The proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. As explained on page 68 of the Lighting Study the cabin lighting level was selected to ensure that the cabins would provide a comfortable and safe interior illumination.

Comment P702-38 LA ART must present an operational plan. In real life, gondola systems often cannot operate at or near their rated capacities. The 3S system in Bolzano, Italy is one example. For various reasons, including compact station design and comfort/ease of passenger loading, that system operates at a capacity of approximately 500 people per direction per hour with 3-to-4-minute headways, which is much lower than its maximum capacity. This gondola system also has notoriously long lines and poor passenger circulation inside the station. They allow their cabins to come to a full stop at the stations by default during boarding and deboarding, which is not the case for The LA ART Gondola.

(https://www.gondolaproject.com/2010/07/29/the-bolzano-3s-funivia-del-renon-part-3/)

Response P702-38 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would

also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop a cabin is factored into the overall system capacity of the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable gondola systems in cities around the world operate at their design capacities. Additionally, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station.

Comment P702-39 If a person with mobility issues wants to board, how will they make the request to a station attendant? There are many monolingual Chinese speakers in Chinatown. Will there be interpreters at the stations? How will that station attendant stop the gondola cabin? How long can a cabin be stopped without causing the entire gondola system to come to a halt? How does this impact boarding for all of the other cabins in the station? Because the cabins do not come to a full stop by default, this suggests that the boarding area will be a chaotic free-for-all which would be very unsafe, especially if the stations do not have adequate space for boarding. The constant movement of the cabins means more space is needed for boarding.

Response P702-39 The proposed Project would include multilingual signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop a cabin is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Comment P702-40 The dim, underseat lighting of the cabins at night is a security problem. Security video will not be as clear, and in a crowded cabin, the darkness increases the likelihood of accident or injury. People may be more likely to bump into each other and start fights. Would this dark lighting be acceptable on Metro's buses or trains?

Response P702-40 Refer to Topical Response J, Gondola Design and Operations, for discussion of operational safety. Refer to Topical Response K, Signage and Lighting, and Response P702-57A for a discussion of the proposed Project's cabin lighting. Light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems.

Comment P702-41

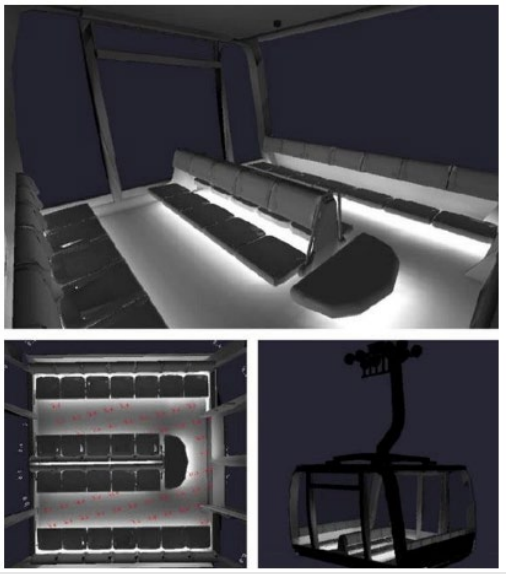


Image from DEIR Appendix C – Visual Impact Analysis / Lighting Design

There needs to be greater consideration for security of the gondola infrastructure to prevent unintended uses of the system. If the opening of the Sixth Street Viaduct is any indication, the absence of ladders will not prevent people from climbing the towers and stations. If a person is able to get access to the Dodger Stadium parking lot or the Broadway Junction, would they be able to use The Gondola as a zip line?

https://www.nbclosangeles.com/news/local/sixth-street-bridge-arches-boyle-heights-downtown-la/2944212/

Response P702-41 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project system components would be equipped with security features to ensure system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers will be secured at all times and only accessible by authorized personnel. The system components will be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Additionally, it is anticipated that system towers would include anti-climb design features.

Comment P702-42 What would prevent an individual from prying open the doors of a gondola cabin and jumping out for whatever reason? This happened on the Peak2Peak gondola in 2014.

(https://www.cbc.ca/news/canada/british-columbia/base-jumpers-condemn-illegal-whistler-peak-2-peak-stunt-1.2534544)

Response P702-42 As discussed in Section 2.0, Project Description, of the Draft EIR, each cabin of the proposed Project would have a set of two sliding doors that open and close automatically under safety controls in stations. The cabin doors would be equipped with a locking mechanism to prevent their opening other than at designated points along the proposed Project alignment. Additionally, each cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin.

Comment P702-43 During the summer months, the gondola cabins, with its large windows that do not open, will be like greenhouses. Will people be able to open the windows in an emergency, and if so, won't that allow people to throw items outside of the cabin that could harm people, such as cigarettes, bottles, and trash? Will the vents for air circulation in the cabins include holes that are large enough for a cigarette?

Response P702-43 As discussed in Section 2.0, Project Description, of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins.

Comment P702-44 After a breakdown of the Roosevelt Island Tram on April 18, 2006 that left 69 people trapped for 11 hours

(https://www.nytimes.com/2006/04/20/nyregion/options-were-limited-after-a-power-surge.html), the tram was required to keep an emergency kit, including blankets, a toilet, and a privacy curtain inside the cabin in case of breakdown. The tram broke down after a power surge. The backup system had been out of service for a while. The tram, however, has an attendant. Will the gondola cabins have an emergency kit that includes a toilet and will the emergency kit be accessible? How will the kit be kept secure without an attendant on board each cabin?

Response P702-44 The cabins are not anticipated to have such an emergency kit, which are not typical for urban gondola systems. As discussed in Section 2.0, Project Description, of the Draft EIR, backup power for the proposed Project would be provided by battery storage located at each station and tower and the non-passenger junction. The battery storage system would be tested on a regular basis and would provide backup power to allow unloading of the system in the event of a power grid failure. Refer to Topical Response J, Gondola Design and Operations, for discussion of how an Emergency Operations Plan would be prepared as part of the proposed Project and

would set forth guidelines for a wide range of scenarios. The Emergency Operations Plan would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD).

Comment P702-45 The Broadway Junction is within an earthquake liquefaction zone, methane zone, and within the fault zone of the Upper Elysian Park earthquake fault. We are concerned that there are too many risks associated with building an junction station at this location.

Response P702-45 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction and seismic related ground failures, upon implementation of Mitigation Measure GEO-A. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release.

Comment P702-46 Visual Impacts

The Gondola Project's enormous towers will cause visual impacts in our neighborhood. We are concerned that the towers will obstruct views. This project also introduces too much cold and bare concrete into our historic neighborhoods. We already have enough concrete from the elevated Metro L Gold Line. We do not need more.

Response P702-46 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C,

Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P702-47 We have previously been told that the Broadway Junction would be 78 ft high, then 84 ft high, and now 98 ft high. This non-passenger station will block our neighborhood's Downtown skyline views and give them to this private company and their gondola customers. This project blocks out much more of the views than the mixed-use, residential project that was previously approved for the site at the Broadway Junction, 1201 N Broadway. That residential project concentrated the height and bulk of the building along Broadway and stepped down the height of the development closer to Savoy Street. The Junction does not do this.

Response P702-47 Refer to Section 2.5.1.4, Broadway Junction, Figure 2-20: Broadway Junction Cross Sections, and Table 2-2: Proposed Project Station and Junction Details Section 2.0, Project Description, of the Draft EIR, for details regarding the Broadway Junction. Broadway Junction is a non-passenger junction would be located at the intersection of North Broadway and Bishops Road. The junction would primarily be located on privately-owned property with a portion of the junction and overhead cable infrastructure cantilevered and elevated above the public ROW. The existing commercial building located at 1201 N. Broadway would be demolished. Broadway Junction would be approximately 227 feet long, 60 feet wide, and 98 feet high at its tallest point, with the platform approximately 50 feet above the ground. Vertical circulation elements (i.e., elevators and stairs) would be installed on the northwest side of the junction for staff and maintenance access to the platform. As discussed on Section 5.0, Other CEQA Considerations, of the Draft EIR, the previously approved mixed-use redevelopment at 1201 North Broadway is included as a related project. The 1201 North Broadway project involves the construction of a new seven-story mixed use building on the corner of North Broadway and Bishops Road. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As identified on pages 3.1-12 and 3.1-13, under the LA CEQA Thresholds Guide, visual impacts are assessed based on changes to views from publicly accessible locations or public views. Reference to analysis of residential views and resident viewer groups are provided only for informational purposes.

Comment P702-48 The gondola cars will be used for advertising and electronic billboards. The DEIR only says that they will abide by Metro and City regulations for signs. What messages would the private developer be allowed to display all over our communities for their private gain? Will our communities be subject to advertisements from authoritarian governments that violate human rights, as a platform for self-promotion and propaganda during the Olympics? What other types of objectionable, offensive, or harmful messages could become regular sights on gondola cabins over LA State

Historic Park and our neighborhoods because of this project, which would operate 18 hours per day? Online gambling, liquor, cryptocurrencies, advertising of luxury brands? Who would decide what is acceptable? How would this be regulated?

Response P702-48 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's signage. No digital signage is proposed on the exterior of the cabins. Regarding sign content, the Los Angeles Municipal Code Section 14.4.4 prohibits signs that contain obscene matters, as defined in Section 311 of the Penal Code of the State of California. Outside of the prohibition on obscene matters, signs have free speech protections under the First Amendment of the United States Constitution and accordingly sign regulations are generally content-neutral and instead focus on time, place, and manner regulations. Nevertheless, the proposed Project's signage would be designed to be consistent with Metro requirements including Metro's Advertising Content Guidelines as applicable, which are updated from time to time. Metro's Advertising Content Guidelines include a number of restrictions on advertising including prohibiting the advertising of all alcohol, tobacco, and cannabis products services and events. Metro's Advertising Content Guidelines also provide that advertising may not be displayed if its content involves: illegal activity; violence; demeaning or disparaging matter; vulgarity; obscene matter; adult entertainment and content; political endorsements; religion, negative connotations of public transit; unsafe transit behavior; content injurious to Metro's interests; or content harmful or disruptive to the transit system.

Comment P702-49 The shadow study does not consider the impacts of shadows from the gondola cabins. If there are gondola cabins leaving every 23 seconds, there could be a gondola cabin passing over a particular point along the path every 12 second, which could cast a flickering shadow on a person who is in their yard, sitting in the park, or sitting at home. This type of flickering would be a significant nuisance. For much of the day, large portions of the southern half of the park could be rendered useless for peaceful enjoyment.

Response P702-49 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to pages 3.1-53-3.1-56 for specific results related to visual operational impacts related to shadows. The shade/shadow study included in Appendix C, visual Impact Assessment, of the Draft EIR, focuses on station, tower, and junction structures because those structures would result in longer, predictable shadows on surrounding uses. As the gondola cabins would be moving and would only result in shadows that pass briefly over any particular area, thresholds in the LA CEQA Thresholds Guide would not be exceeded by the cabins. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of

9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Comment P702-50 A major issue for aerial transport is flying over homes, and yet in this 8,000 page draft EIR, there is no image that shows what it looks like over our homes. There are only two images that include a glimpse of the apartment building (438 Savoy Street) next door to the Broadway Junction. The only views are facing the Broadway Junction. There should be renderings that show the gondola cabins as they pass over our homes.

Response P702-50 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As identified on pages 3.1-12 and 3.1-13, under the LA CEQA Thresholds Guide, visual impacts are assessed based on changes to views from publicly accessible locations or public views. Reference to analysis of residential views and resident viewer groups are provided only for informational purposes. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. While it is impractical to simulate every location, additional simulations for public consideration are included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P702-51 LA ART claims The Gondola's cables over LA State Historic Park would not be significantly more impactful to views than the Gold Line's overhead catenary wires. We disagree. The Gondola cables are much thicker and hang directly over greenspace of the park.

Response P702-51 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated

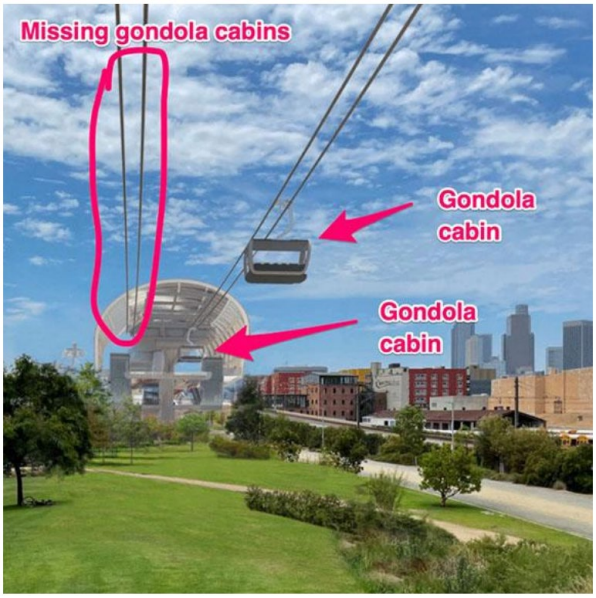
overhead catenary system. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including visual simulations to provide additional clarity regarding ropeway cable design for the gondola cabins. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulations were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible.

Comment P702-52

P702-52A

DEIR Image of Chinatown / State Park Station at LASHP with Notes

- Throughout this document are misleading images that downplay the visual impacts of The Gondola project by omission. For example:
    - Only showing two gondola cables in each direction, instead of three. This was in many of the renderings.
    - Omission of gondola cabins in images.



DEIR Image of Chinatown / State Park Station at LASHP with Notes

In this DEIR, The Gondola is never shown operating at full capacity. The main purpose of this system is to relieve traffic for Dodgers games, which LA ART claims can be helped by operating at maximum capacity for a full two hours before and after Dodgers games and events. But in all of the images, there are no lines, the stations are almost empty, the cabins are empty or only have 6 or 7 people (15% capacity). These images do not accurately reflect the challenge of operating this system. These images also do not accurately reflect the real-life challenges of accessing and using this system as a gondola customer.

P702-52B

Draft EIR does not show where any of the jumpers would be. Jumpers are the large metal contraptions attached to the gondola cables that keep the cables a safe distance apart. They are a safety device that are a part of other 35 gondola systems. Are they not needed in The Gondola project? If they are needed, where would they hang over LA State Historic Park and our neighborhoods? The cables are very thick and noticeable, but the jumpers are bulky and even more noticeable.

Workers performing repairs on Toulouse 3S Teleo Gondola, which suffered several breakdowns during the first month of service.

Response P702-52

P702-52A Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including a depiction of the system operating at maximum capacity with passengers within the cabins, as well as visual clarification on the dimensions and spacing of the ropeway cables and spacing of the slack carriers that maintain clearance between the three ropes that comprise the ropeway. Updates were made to the visual simulations where it appeared only two ropes were visible instead of three. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulations were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible. Refer to Section 3.01 Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for additional information regarding the choice of KOP locations and vantage points.

P702-52B The image included in Comment P702-52B appears to be from an article in "Le Parisien;" the caption underneath the image in the article explains, in French, that "the operators of Altiservice, the operator of Téléo [aerial transit system in Toulouse], checked the jumpers [slack carriers], these metal parts which maintain the distance between the cables."[32, 33] Slack carriers are devices that support and maintain proper separation between the cables of 3S systems. Slack carriers are attached to the system's two stationary cables (the "track ropes") and provide support sheaves for the third cable that circulates continuously around the system (the "haul rope"). The proposed Project would utilize slack carriers. While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phases of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350-500 feet with adequate separation from the stations,

[32] Périé, Paul. 2022. À Toulouse, une maintenance spectaculaire pour le téléphérique Téléo. Available at: https://www.leparisien.fr/haute-garonne-31/a-toulouse-une-maintenance-spectaculaire-pour-le-telepherique-teleo-10-08-2022-EOFH5CXWIBDSDEG6FP6KSK5XJE.php. Accessed August 2023.

[33] Google Translate. Available at: https://translate.google.com/?sl=auto&tl=en&text=les%20op%C3%A9rateurs%20d%E2%80%99Altiservice%2C%20l%E2%80%99exploitant%20de%20T%C3%A9l%C3%A9o%2C%20ont%20notamment%20v%C3%A9rifi%C3%A9%20les%20cavaliers%2C%20ces%20pi%C3%A8ces%20m%C3%A9talliques%20qui%20maintiennent%20l%E2%80%99%C3%A9cartement%20entre%20les%20c%C3%A2bles&op=translate. Accessed September 2023.

junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane.

Included below are photographs of slack carriers used in comparable aerial transit systems.[34] In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes supplemental KOPs illustrating representative slack carriers for the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P702-53 The DEIR includes many misleading images that downplay the visual impacts of The Gondola project by using “forced perspective”.

[34] Clockwise from top left:
Gric, R. & Nejez, J. 2017. The 3S Gondola Lift Is 25 Years Old. Available at: https://en.isr.at/singleview-en-old/article/the-3s-gondola-lift-is-25-years-old. Accessed August 2023.
Dale, Steven. 2017. The Koblenz Rheinseilbahn, Part 1: Introduction. Available at: https://www.gondolaproject.com/2010/09/13/the-koblenz-rheinseilbahn-part-1-introduction/. Accessed August 2023.
SCJ Alliance Consulting Services. 2023. Photograph of Funivia del Renon.

Use of forced perspective with tourist attractions like the Leaning Tower of Pisa is popular in tourist photography

- Forced Perspective – Rendering of towers on Alameda

Image from DEIR – Towers on Alameda Street

- Forced perspective – Broadway Junction

Figure 5-25: Existing and Simulation Views of KOP 22 – Looking Northeast on North Broadway from Cottage Home Street

Image from DEIR – Broadway Junction viewed on Broadway. The 98 ft tall Broadway Junction is hidden in the background and made to look smaller than the 40 ft tall utility pole.

- Forced perspective – Chinatown / State Park Station

Figure 5-13: Existing and Simulation Views of KOP 12 – Looking North on Alameda Street/Spring Street from South of College Street

Image from DEIR – Chinatown / State Park Station in the background

  - Also figures 5-14, 5-20b, 5-21, 5-22, 5-24 are taken from deceivingly far away from the subject, to make the towers or stations look small.

Response P702-53 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As discussed in Section 3.01, identification of potential aesthetic and visual impacts included the identification of Landscape Units (LU) that defined particular viewsheds and/or aesthetic settings within the Project area, as well as Key Observation Points (KOPs) within each LU that are representative of the visual character of the area. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Visual simulations were created to showcase the pedestrian eye level vantage point within photographs and, as such, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for KOPs and simulations updated in part to provide additional aesthetic and visual illustrations. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR for additional information regarding the choice of KOP locations and vantage points. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the KOPs.

Comment P702-54 There is a significant visual impact of the gondola station at the entrance of LA State Historic Park and the gondola cabins as they travel in and out of that station over the park, which is not shown or discussed in the visual impact assessment. The DEIR should show a rendering of this site. This site is the end of the stream (or river) that runs along the eastern edge of the park. This stream fills up and flows during heavy rains. There is also an art installation/monument at this site, called “Origins” by Debra Scacco. This is just north from where LA ART is proposing to build restrooms and concessions.

- “Origins” – “Works by Debra Scacco explore the notion of place. Her LA River works explore the unique history of the river, and the role it has played in shaping modern-day Los Angeles.”

Photos of River and Art Inside the Southern Entrance at LASHP

Response P702-54 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park.

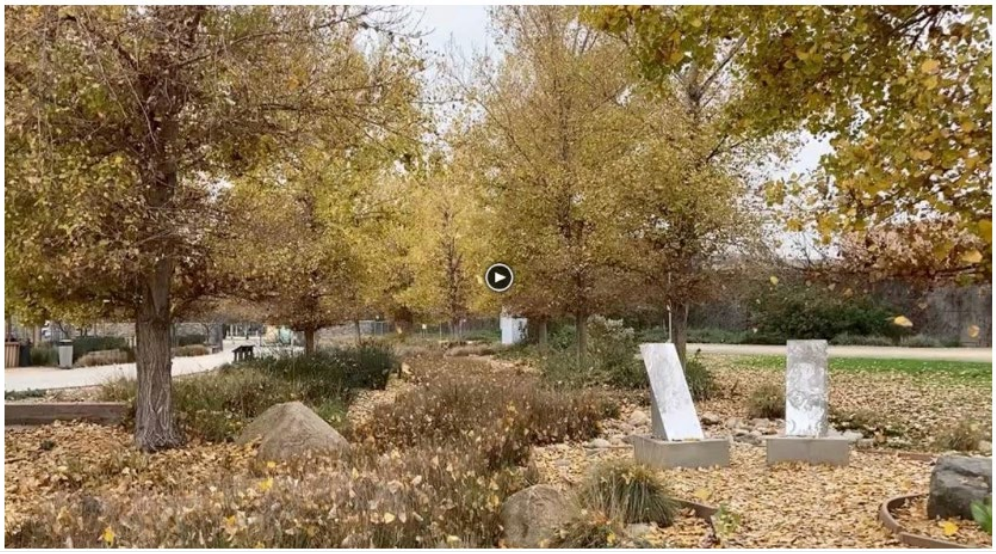
The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park.

Nevertheless, the Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental

KOPs, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, which includes views from a cabin over the park, providing a new and unique perspective of the park, and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, "The BSA does not include water features falling under CDFW jurisdiction." As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on Los Angeles State Historic Park, including reducing the size and scale of the station, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

Comment P702-55

- The visual impact of cutting down the trees at the entrance of the park and building restrooms and concessions at the entrance is not addressed. This is a very picturesque portion of the park. Also, what is the visual impact of the gondola cabins casting shadows over people who are trying to enjoy their portion of the park?



Inside the Southern Entrance at LASHP

Response P702-55 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including the concessions and restrooms at Los Angeles State Historic Park. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for an analysis of the Supplemental KOPs in Response to Comments, which confirmed the Draft EIR determination that aesthetic impacts of the proposed Project would be less than significant. Refer to the shade/shadow analysis for the proposed Project included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Response P702-49 for discussion of the cabin shadow, which would be less than significant.

Comment P702-56 The visual impact of the large gondola station sitting in front of the southern/pedestrian entrance of the park seems out of place, unwelcoming, and intimidating. It seems like bad Feng Shui.

Response P702-56 As discussed in Section 2.0, Project Description, of the Draft EIR, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. The southern portion of the station would be located on City ROW, while the northern portion of the station would be integrated into the southern boundary of the Los Angeles State Historic Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. The aesthetic impact of the Chinatown/State Park Station is discussed as part of the discussion of Landscape Unit (LU) 3. The Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual

lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by LA ART riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park. Refer to the KOP Figure Mapbook included in Appendix C, Visual Impact Assessment, of the Draft EIR, for visual simulations of the Los Angeles State Historic Park prepared to identify the anticipated changes to key viewpoints, including the southern entrance at the park. The simulations and analysis concluded that higher quality views would experience only limited impacts, and that views would still be available from other more prominent locations within/of the park. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes additional KOPs of the park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P702-57

P702-57A Cabin lighting as shown in the lighting plan is too dark. When everyone is sitting down, it will be fully dark. Overhead lighting inside the cabins is needed for many reasons:

- Safety and security reasons, especially after Dodgers games and events. A lot of fights start when people are drunk and bump into each other, for example, after the Elton John concert, Brian Stowe, etc.
- If a fight breaks out in a gondola cabin and it is almost pitch black, what's going to happen. The video system is the onboard security system, but the video quality and clarity is much lower in darkness.
- In a packed cabin that is dark, how hard will it be to find and press the emergency call button to talk to security? This is a huge safety liability.

P702-57B

- If you are adding overhead lighting in the cabins, then people may not be able to see the city light views at night. How will that impact revenue for the gondola from tourists? This will need to be factored into any funding plan for the gondola project.
- Would Metro allow buses and trains at night to be pitch black except for underseat lighting? We don't think so. This raises the question: Is this project transit or is it a tourist trap?

Response P702-57

P702-57A Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's cabin lighting. As discussed on page 55 of the Lighting Study, which is

included in Appendix C, Visual Impact Assessment, of the Draft EIR (and within the Lighting Study Appendix A: Building Lighting Concept Plan), the lighting for the proposed Project was designed to provide the necessary illumination for passengers to safely board and enjoy the proposed Project. As explained in the Building Lighting Concept Plan, the illuminance design standards for the Project were developed in accordance with the California Electric Code, the Illuminating Engineering Society (IES) recommendations and transit system operation standards prepared in coordination with the proposed Project's lighting, design, and gondola systems technical consultants. As explained on page 68 of the Lighting Study, this cabin lighting level was selected to ensure that the cabins would provide a comfortable and safe interior illumination. As further detailed on page 68 of the Lighting Study, the light source for the cabins includes concealed low level linear lights as well downlighting that would be used to increase the cabin lighting levels during loading and unloading and in emergency situations. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination.

P702-57B Refer to Response P702-57A and Topical Response K, Signage and Lighting, for a discussion of the proposed Project's cabin lighting. Light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled

operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment P702-58 Graffiti – There needs to be a plan to manage graffiti on The Gondola, including the cabins, towers, and stations. After the opening of the 6th Street Viaduct, LA City Council had to approve an extra fund, approximately $700,000 for one year of graffiti abatement.

- LA Magazine: "Members of the Los Angeles City Council found themselves debating whether events at the Sixth Street Bridge are why we just can't have nice things – weighing a proposed $706,000 for graffiti removal and repair for a public works project not yet one month old, ABC7 reports. The stately arches of the 6th Street Viaduct, which connected Boyle Heights with the Arts Districts, attracted more than oohs and ahs since opening on July 10. Increasingly daring pedestrian and vehicular adventurers began to converge on the Instagram magnet to pull stunts, burn rubber, tag up, or make their mark in other ways."

  https://www.lamag.com/citythinkblog/now-the-6th-street-bridge-will-cost-l-a-700k-in-grafitti-clean-up/

Response P702-58 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P702-59 The gondola built in Rio for the Olympics closed permanently only weeks after the closing of the 2016 Olympic games

(https://wired.com/story/rio-de-janeiro-favela-cable-car-gondola/). The visual impact of this project, should it be built and subsequently run out of funding, would be huge. Safeguards must be in place if the project fails or the applicant decides that they will no longer operate and maintain it. Not only would the structures be an embarrassment and an eyesore, an abandoned system would fall into disrepair and pose a safety hazard. Should this project be approved despite all of our communities' concerns, there must be a substantial surety bond paid entirely by LA ART that will guarantee that every part of this project can be removed from our neighborhoods without costing taxpayers.

Response P702-59 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P702-60 Traffic / Transportation

The neighborhood around Savoy Street already experiences a lot of traffic and is a heavily accessed corridor. There is traffic from Cathedral High School, both everyday student pickup & drop-off and special events. There is traffic from people accessing the 110 FWY Stadium Way onramp and offramp. There is also traffic from Dodger Stadium games and events. On a typical game day, the traffic starts backing up on Bishops Road approximately 30 minutes before the game. For special or sold out games, the backup usually starts 1 hour before the game. For special events or opening day, the traffic can start backing up into our neighborhood 2 hours before the game. As residents, we are accustomed to planning around the Dodger traffic. We never thought we would have to think about the traffic flying over our heads.

Response P702-60 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit

connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities including on Bishops Road and Savoy Street. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, including Bishops Road, arterial roadways, and freeways during game and special event days.

Comment P702-61 The Gondola Project does not make sense as a transit solution for Dodger Stadium games and events. It will simply displace traffic further into our neighborhoods and cause traffic jams around the gondola stations. It will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P702-61 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets including Savoy Street, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as

the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Nevertheless, the proposed Project does not include a station in the vicinity of the Savoy Street neighborhood. By providing an alternative mode of travel for game and event attendees at Dodger Stadium, vehicular traffic destined to and from the Dodger Stadium property, including vehicles using Bishops Road or Savoy Street to obtain access to the Dodger Stadium Downtown Gate, would be reduced.

Comment P702-62 What happens if there are extra innings? Will The Gondola system be allowed to operate later than 12am or will there be only bus service in that case? If people do not want to ride the Dodger Stadium Express bus, they may take a rideshare, which would increase traffic in our neighborhoods. If the games end later than 10 or 10:30, many people who LA ART expects will take the gondola after the game to access transit at Union Station would need to take rideshare home because buses and trains stop operating at around midnight.

Response P702-62 As detailed in Section 2.0, Project Description of the Draft EIR, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, including to extend the hours of operation if necessary to account for extra innings. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. The limited operation of the regional transit system at LAUS in the evening is a condition faced by riders of the Dodger Stadium Express today, and the approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game is factored into the proposed Project's ridership model. The Project Sponsor would coordinate potential improvements to late night service with Metro, Metrolink, and other transit service providers.

Comment P702-63 A UCLA Mobility Study came to a different conclusion than the Traffic Study/ VMT Analysis in the DEIR. "Transportation researchers from the University of California Los Angeles (UCLA) used a state-of-the-art transportation simulation based on a Nobel-Prize winning model and found that the gondola has limited impact – less than 1% - in reducing traffic on major roads around Dodger Stadium on the night of a sold-out game. They also found that far fewer passengers would likely get to the gondola via public transit connections than LA ART claims. Without reducing traffic and increasing

public transit connections, the gondola does little to change our air quality and reduce greenhouse gas emissions."

(https://www.stopthegondola.org/ucla-study) The UCLA Study's findings appear more in line with common sense.

Response P702-63 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

> **Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection**
>
> The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
> Jiaqi Ma
> Director, UCLA Mobility Lab
> Faculty Associate Director, UCLA Institute of Transportation Studies

Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[35] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P702-64 We are concerned about the bus stop at Bishops Road and Broadway. Where would the bus stop be relocated during construction and where is the pedestrian access to the bus stop? The bus stop is used by residents and some Cathedral High students.

Response P702-64 Bus stops at Broadway and Bishops Road are currently located on the northwest side of Broadway northeast of Bishops Road and on the southeast side of Broadway southwest of Bishops Road serving the LADOT Lincoln Heights/Chinatown DASH and Metro Line 45. Potential effects of the construction of the Broadway Junction on

[35] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

these bus lines is discussed on pages 50 and 51 of the *Los Angeles Aerial Rapid Transit Project Non CEQA Transportation Assessment*.[36] As discussed in the Assessment, during construction of the Broadway Junction, these routes would need to be rerouted during the deck construction (two weeks) and deck removal (three weeks). Given the size of LADOT DASH buses, the DASH route could be rerouted to bypass the closure using Savoy Street, Bishops Road, and Cottage Home Street, with the existing bus stops at Broadway and Bishops Road relocated to Bishops Road and Savoy Street. Given the larger size of Metro buses, two options are suggested for providing continued service for Metro Line 45 during this time: (1) operating smaller buses on the line bypassing the closure using Savoy Street, Bishops Road, and Cottage Home Street; or (2) rerouting the line to Spring Street, with a temporary on-demand van service or Uber/Lyft vouchers provided for residents and employees of the area along Broadway, as well as Cathedral students, who rely on Metro Line 45 local service along Broadway to connect with the detoured route during the five weeks of detour.

Comment P702-65 If the GHG emissions reductions were calculated using overall trip length to Dodger Stadium, with an average trip length of miles. The Gondola, however, only operates a 1.2-mile route. The VMT calculated should only include the 1.2 miles between Union Station and Dodger Stadium. The only transit it would provide is the 1.2 miles between the Alameda Station and Dodger Stadium, or the .6 miles between the Chinatown/State Historic Park Station and Union Station. The Gondola has no control over whether people will use transit to access the gondola stations. The mode share evaluation is based on the fault assumption that there will be no wait times at the gondola stations. The estimates that only 25% will drive or use rideshare is based on faulty comparison to Crypto.com arena data. Transfers need to be taken into consideration. Crypto.com arena has direct access to rail, which has a shorter wait time than The Gondola. For many of the riders at Crypto.com, they do not need to make a transfer to another form of transit. For The Gondola, everyone who doesn't live in Chinatown or the Union Station area will need to make a transfer, which includes riders who live in the 90012 zip code which extends into the Downtown LA Civic Center.

Response P702-65 Refer to Section 3.17, Transportation, and Appendix N, Ridership Model Development, of the Draft EIR, and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. The proposed Project is expected to attract new transit riders connecting to the proposed Project at LAUS or the Chinatown Metro L Line (Gold) Station. As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 3.17, Transportation, of the Draft EIR, riders would access the proposed Project via

[36] Fehr & Peers. 2022. Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment. Since this report concerns non-CEQA effects of the Project, it is not required to be included in the Draft EIR or Appendix N to the Draft EIR. The report was made available for public review in September 2022 on the project's SB 44 website, which is linked via Metro's LA ART website and is available at the following link: https://laartsb44.net/#!/documents.

bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the estimated non-auto mode of access of 67.5%. For any riders who would be new transit riders using the regional transit system to travel to and from LAUS, the VMT reduction was correctly calculated for the entire length of what had been a vehicle trip to and from Dodger Stadium, not just the 1.2-mile length of the proposed Project alignment.

The comment states that the mode share evaluation is based on a faulty assumption that there will be no wait times at the gondola stations. This is not accurate. As shown on page 5 of Appendix N, Ridership Model Development, of the Draft EIR, total travel time including transfer time was included in the modeling for travel between LAUS and Dodger Stadium for both the Dodger Stadium Express and the proposed Project.

The comment states that the estimate that 25% will drive or use rideshare to obtain access to the Project was based on a comparison to Crypto.com arena data. As described on page 8 and in the table following page 22 of Appendix N, Ridership Model Development, of the Draft EIR, the estimated mode of access to the proposed Project was determined through a review of data provided by Metro for the Dodger Stadium Express, and was 26%. Additionally, as detailed on page 22 of Appendix N, Ridership Model Development of the Draft EIR, for a conservative analysis the driving mode of access for the additional 20% of choice riders was assumed to be 65%, resulting in a total driving mode of access for the proposed Project of 32.5%.

Comment P702-66 Most of Metro's Transit (bus and rail) stops at midnight. If the gondola operates until midnight, what happens if a game goes into extra innings?

Response P702-66 Refer to Response P702-62 for a discussion of post-game transportation.

Comment P702-67 Construction road closures are significant in Chinatown, which is already burdened with traffic during rush hour, and when there is a major event at Dodger Stadium of LA State Historic Park. In our neighborhood on Savoy Street, we also have traffic from special events and daily student drop off and pick up at Cathedral High School. Fire and paramedic access would be compromised during road closures for construction.

Response P702-67 A detailed discussion of emergency access during construction is provided on pages 3.17-45 to 3.17-66 in Section 3.17, Transportation of the Draft EIR, including the evaluation of potential impacts on emergency services. Proposed Project construction would occur in various phases, which would have different effects on the street system. Section 3.17 details anticipated construction period work areas and temporary traffic handling measures such as temporary lane configuration changes. Mitigation Measure TRA-B requires implementation of a Construction Traffic Management Plan ("CTMP"), including street closure information, detour plans, haul routes, and a staging plan. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP must be reviewed and approved by the City of Los Angeles. The CTMP requires the proposed Project to coordinate with the City and

emergency service providers to ensure emergency access is provided to the proposed Project alignment and component sites and neighboring businesses and residences. With implementation of Mitigation Measure TRA-B, impacts to emergency access would be less than significant.

Comment P702-68 The Elton John concert ending at 11:15 pm. Would The Gondola have shut down at midnight in that case? Would concerts at Dodger Stadium be required to end at 10 pm?

Response P702-68 As detailed in Section 2.0, Project Description of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, including to extend the hours for concerts and other events at Dodger Stadium.

Comment P702-69 After construction is finished, would the same road closures be needed to replace major equipment in the elevated stations, including the Broadway Junction which is an elevated, 98ft tall non-passenger station? Cranes would be needed to replace major equipment, and where would they be sited? Where would the equipment be staged? What is the frequency with which major maintenance would be needed even in the best case scenario in which there are no major equipment failures.

Response P702-69 As discussed in Section 2.0, Project Description, of the Draft EIR, within the stations and junction, overhead bridge cranes would allow the insertion or removal of equipment as may be required for maintenance activities. Maintenance activities may require temporary lane closures for trucks or crane trucks to lift equipment. Maintenance activities, including equipment replacement, would not necessitate the same road and lane closures as those necessary for the construction of the proposed Project.

Comment P702-70 It looks like the Broadway Junction would be built close to the property line on Bishops Road. This is already a problem area, as there is no sidewalk on this side of the road even though it is an official route to Dodger Stadium.

Official Route to Dodger Stadium at Bishops Road – No Sidewalk on One Side

If the gondola has a malfunction, thousands of people may choose to walk down from the Dodger Stadium gondola station from the Downtown Gate, onto Stadium Way and then walk along this route on Bishops Road, using the gondola cables as reference for how to get back to Union Station. There need to be wide sidewalks on this route versus the narrow, unmaintained sidewalks, or non-existent sidewalks. Even on Broadway, the sidewalks are mostly narrow until you get to Golden Dragon.

Sidewalks on Stadium Way Towards Downtown Gate

Response P702-70 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is unlikely to become inoperable due to a system malfunction. The proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload passengers from the system. The proposed Project would also include routine maintenance that would be performed by the system operator, and the overall system would be observed on a daily basis as part of the startup routine. Additionally, the proposed Project would include the installation of backup battery storage at each station, tower, and junction, as needed, to provide backup power to allow unloading of the system in the event of a power grid failure. Finally, the Emergency Operations Plan of the proposed Project would include procedures to be followed in the unlikely event that the proposed Project becomes inoperable for an extended period of time. In such a scenario, pedestrians at Dodger Stadium could be routed via the Downtown Gate to Stadium Way to the existing pedestrian bridge over State Route 110 (SR-110) to the Metro L Line (Gold) Station, and if necessary, traffic control officers could be relocated to this route to facilitate pedestrian travel and safety. This route is shorter and has continuous sidewalks. Refer to Topical Response C, Project Features, for discussion of the proposed Project's pedestrian enhancements.

Comment P702-71 On November 16, 2022, Metro's Ad Hoc Olympics planning committee gave a presentation that indicated an interest in using Dodger Stadium as a park-and-ride lot for the Olympics, citing the positive experience with the recent MLS Championship match

(https://www.espn.com/soccer/major-league-soccer/story/478859/mls-cup-final-in-la-to-have-no-parking-for-fans-due-to-usc-game). The draft EIR does not address the impacts of using Dodger Stadium as a park-and-ride lot, whether for the Olympics, for major events at LA Historic Park, or year round for rush hour commuters into Downtown's Civic Center. This is a foreseeable use of that property that would be enabled and made much more frequent by The Gondola, and must be studied in the DEIR. Additional vehicle traffic into our neighborhoods could result in substantial increases in traffic, GHG emissions and pollution in our neighborhoods and in Elysian Park.

Response P702-71 At Metro's November 16, 2022 Ad Hoc Olympics Planning Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A). [37] The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A). Based upon a review of this meeting, no member of the Ad Hoc 2028 Olympics

[37] Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

Committee discussed the potential for using Dodger Stadium as a parking location for the 2028 Olympics.[38] Rather, this commenter raised the possibility themselves during public comment at the meeting. Accordingly, the mere speculation of a single commenter does not mean that Dodger Stadium could be considered as a proposed parking location for the 2028 Olympics such that the Draft EIR should have considered the use of Dodger Stadium as a park-and-ride. This is not a reasonably foreseeable consequence of the proposed Project, as the Los Angeles Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner is too speculative to require the analysis in the EIR for this aerial gondola system.

The comment suggests because Dodger Stadium was used as a park and ride for the MLS Cup final in November 2022, Dodger Stadium may similarly be used for other events. However, this was a unique situation that is not a reasonably foreseeable consequence if the proposed Project were to be constructed and implemented. The scenario described involved Major League Soccer's championship game, the location of which was not scheduled in advance. As the commenters' cited article notes, the Los Angeles Football Club's ("LAFC") Banc of California Stadium was only confirmed as the host of the MLS Cup the Sunday prior to the MLS Cup, which would occur at the same time as a pre-scheduled University of Southern California football game at the Los Angeles Coliseum. This meant that parking within the vicinity for the football game took priority, and LAFC was required to coordinate with and obtain approval from the Los Angeles Dodgers for use of the parking lot. It is highly unlikely that such an event would repeat with any sort of frequency requiring the analysis in the EIR for the proposed project. Even so, LAFC utilized shuttle buses from Dodger Stadium to the Banc of California Stadium, and there is no indication that the presence of the proposed Project would have increased the likelihood that Dodger Stadium would be used as a parking location for major events. In sum, the proposed Project would connect LAUS to the Dodger Stadium property via an aerial gondola system. The proposed Project does not contemplate the use of the Dodger Stadium parking lot as a park-and-ride and nor is this use reasonably foreseeable, and accordingly, no such analysis is required.

Comment P702-72 The Dodger Stadium parking lots have 5 entrances. There are huge wide roads leading up to Dodger Stadium. This gondola is not solving the problem of going up a mountain that can only be accessed through only one narrow, windy, two-lane road. Other alternatives, including improvements and dedication of lanes on the roads into Dodger Stadium to encourage access via other modes – bicycle/e-bikes, scooters, and walking – need to be studied in the DEIR.

[38] Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings – November 16, 2022 Metro Ad Hoc 2028 Olympics Committee meeting. Available at: https://metro.granicus.com/player/clip/2413?view_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21. Accessed September 2023.

Response P702-72 As described in Section 2.01, Overview of the Project of the Draft EIR, the proposed Project has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P702-73 Operating The Gondola at a maximum capacity for a full 2 hours before and after Dodger Stadium games and events seems unrealistic. In order to justify the VMT reductions, more information about how The Gondola system will be implemented is required including management of queues, the boarding areas, and crowds. In addition, ticket prices and the so-called ticket reservation system need to be disclosed. Logistically, operating at maximum capacity appears to be unrealistic at best.

- Station attendants have to intervene to bring a gondola cabin to a full stop any time a person with mobility issues needs to board the gondola. Can this really be accomplished without slowing down the entire system when cabins are supposed to leave each station every 23 or 25 seconds?

- We ask LA ART to explain how the passenger loading will be choreographed to make this an efficient and safe boarding process even when the system is operating at maximum capacity. And likewise for deboarding.
- How will the gondola passengers who need their cabins to come to a full stop to deboard make this known to station attendants?
- How many station attendants will be needed at each gondola station to assist customers when the system is running at full capacity?

Response P702-73 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Queues would be managed by efficient vertical circulation and by staff at the station. Refer to Response P702-76 for a discussion of the proposed Project's timed ticket reservation system. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

Comment P702-74 The gondola stations appear to be severely undersized, considering their intention to operate the system at maximum capacity for a full two hours before and after each Dodgers game. People do not arrive or leave Dodger Stadium evenly spaced throughout the two-hour period before and after each Dodgers game. As residents, we observe that on our streets. The DEIR lacks crucial information about how crowds will be managed in the station and how they will be accommodated while waiting outdoors in very long lines. For example, will there be shade structures in the Union Station Forecourt, and how will they be arranged? Will the shade structures impact

the views of historic Union Station? Will there be misting systems to provide cooling while people wait outdoors in long lines in the summer to ride the gondola?

Response P702-74 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station. Due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations. In addition, post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The proposed Project has coordinated with Metro on the design and placement of the Alameda Station vertical circulation within the planned LAUS Forecourt. The proposed Project does not propose shade structures or misting systems.

Comment P702-75 No ticket pricing has been provided to support the claims that this will provide benefits to tourism. Does the price not matter?

Response P702-75 As detailed in Potential LA ART Tourist Ridership in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles.

Comment P702-76 The DEIR fails to describe the timed ticket reservation system that LA ART is relying on to manage wait times and crowds at their stations. Long queues are a common problem of gondola systems, and we are not aware of any gondola systems that serve sports stadiums of this capacity. The details of this reservation system must be

disclosed in the DEIR to determine feasibility because crowds will impact safety, security and ridership of this system. We have major doubts as to the feasibility of a ticket reservation system, and whether one can be implemented in a fair and equitable manner. Unanswered questions include:

- Will the best tickets (closer to the game start time) be held back and reserved for VIPs?
- How would people reserve tickets to leave via the gondola after the game ends, when games don't end at a set time?
- What happens if people arrive late or early? Does LA ART anticipate that people arriving via transit will be able to arrive on time? How many staff will be needed to help customers who have problems with their reservations?
- Will there be a waiting line for people who show up without reservations?
- How many staff would be needed to manage the different queues they might need to manage for customers in different situations: those arriving early, late, on time, and without reservations? Will this not create a bottleneck? Is there space inside the stations for all of these queues?
- Will a Ticketmaster-type system be set up to allow Dodgers fans to reserve their free tickets?
- Will people with a paid membership to an exclusive club or people who hold a particular credit card be given early access to reserve tickets?
- Will tickets be transferable?
- Can LA ART prevent an aftermarket for gondola tickets from forming that makes it nearly impossible for "regular folks" to reserve their "free" gondola tickets, especially those at the most desirable times?
- Will people be allowed to pay a fee to skip the line, similar to a fastpass at Disneyland?
- Will people be able to reserve tickets if they don't have a computer or smartphone?

Response P702-76 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Pedestrian queues are not required to be analyzed under CEQA or the City of Los Angeles Transportation Assessment Guidelines (TAG). Nevertheless, the queuing analysis in Topical Response B is provided for informational purposes. The purpose of the timed ticket reservation system would be to reduce queue lengths and

waiting times for riders waiting to board the proposed Project at the Alameda Station or the Chinatown/State Park Station before a large game or event at Dodger Stadium by managing arrival times. Potential elements of such a system could include: the timed arrival reservations would be free; the reservation system would be online; for those without online access, kiosks could be provided at LAUS, the Chinatown/State Park Station, and/or at Dodger Stadium; reservations would be issued for 30-minute arrival periods and the user would pick a time and the boarding station; the timed ticket reservations would be transferable similar to how game and event tickets themselves are transferable; the timed tickets would be checked by proposed Project attendants at the entrance to the line; those who arrive earlier than their arrival window would be fed into the boarding line when possible in advance of their arrival window or wait until their arrival window; those who arrive later than their arrival window would be held and fed into the boarding line when possible; incentives could potentially be offered to encourage choice of earlier windows; and there would be no exclusive access to preferred arrival windows to particular groups of people. The timed ticket reservation system would likely not be used post-game. The system will be more fully developed prior to proposed Project operations.

Comment P702-77 The plans to deal with the massive crowds and queues at the stations before games and events must be in the DEIR. This is a major omission of essential information for evaluating impacts.

- Where would the queues form, and how many staff would be needed to manage these queues? How would they manage people who are queuing at ground level, but need to use the elevators versus people who can go up the stairs or escalators? Not only would crowds be a safety hazard for the people in the crowds, they would impact street and pedestrian traffic around the gondola stations, perhaps limiting access to LA State Historic Park, Union Station, and El Pueblo.
- At the October 22, 2022 DEIR information meeting, LA ART's representatives stated that the station platforms had capacity for 150 people. This seems rather low for a system that is expected to board at least 80 people every minute. In terms of the Alameda Station, there appears to be some space for queuing at ground level on the Union Station side of the station, but not on the El Pueblo side of the station, which will have stalls set up for vendors. How will this imbalance of queuing on either side of the station impact the usage of both entrances?

Response P702-77 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's management of queuing at stations, and pre-game transportation. The Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores at El Pueblo. There would be two access locations for the Alameda Station – the planned LAUS Forecourt to the east of Alameda Street and the proposed new

pedestrian plaza at El Pueblo north of the Placita de Dolores to the west of Alameda Street. It was assumed that approximately 70 percent of passengers would arrive from the planned LAUS Forecourt, due to its connection to the regional transit system at LAUS, and the remaining 30 percent of passengers would arrive from the proposed new pedestrian plaza at El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas to the station, would be introduced at-grade from the planned LAUS Forecourt and the new pedestrian plaza at El Pueblo. The queues would be managed by efficient vertical circulation and by staff at the station. For the vertical circulation, there would be three escalators connecting the ground floor to the boarding platform from the planned LAUS Forecourt, and of those three, two would serve the peak direction (up in the pre-game/event period and down in the post-game/event period). From the new pedestrian plaza at El Pueblo, one escalator would operate in each direction. In addition, stairs and elevators would be available on both sides of the station. The station's boarding platform would have a queueing capacity of 300 passengers. The management of queues by attendants could also be enhanced when needed, at busy times and to address specific circumstances if needs arise, such as directing passengers into specific locations for queuing. As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. As such, this information is provided only for informational purposes. Queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/ event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations.

Queues at the Chinatown/State Park Station would be accommodated within the Station, given this lesser boarding demand and the larger queuing capacity at the station, and would not interfere with access to Los Angeles State Historic Park.

Comment P702-78 The Gondola project cannot control how people arrive to utilize it. A fancy gondola does not encourage more people to take transit to Union Station. Reliable, convenient, frequent, safe and clean rail and bus service to Union Station will encourage more people to take transit to Union Station. And better management and expansion of the Dodger Stadium Express bus service with dedicated bus lanes all the way to the stadium will encourage more people to take transit to Dodger Stadium. The gondola simply provides a tourist attraction that encourages people to drive to Union Station and then take the gondola.

Response P702-78 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with the Dodger Stadium Express. The regional rail and bus system is important in order for people to take transit to LAUS, which is true for both the Dodger Stadium Express and the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P702-79 The implementation of gondola systems for a given application and environment is very important and unique to each system due to local constraints. The lack of a clear operations plan is highly concerning and will impact the success of the system and the capacities that can be realized.

Response P702-79 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). In addition to designing and implementing an operations plan, the proposed Project would include maintenance activities to be performed by the operator and would include daily observation of the overall system as part of the startup routine. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P702-80 In the Transportation Study in Appendix N, there is a discussion about the "customer experience factor" in riding transit and The Gondola, but only the positive attributes

of The Gondola are discussed. This bias is not surprising. However, they also need to factor in the degradation of the customer experience that will happen when operating at maximum capacity for a full 2 hours before and after every Dodgers game. The analysis estimates a 20% increase in ridership of The Gondola due to the uniqueness and cool factor of the technology and being able to take in views. However, the cabins will be packed, and at night, the lighting in the cabins reflecting off of the windows will obscure any views outside of the cabins. Also, considering that a large number of DSE riders are protesting Frank McCourt's continued ownership of the parking lots, and Frank McCourt's involvement in The Gondola project, we believe there are additional factors that would reduce the ridership of The Gondola system. The customer experience of waiting in long lines, like at Disneyland, also may discourage usage of the gondola during the full 2 hour period after games and events.

Response P702-80 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. Refer to Responses P702-73 through P702-78 for discussion of queueing. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the operations features of the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely and efficiently. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P702-81 The ridership estimate for The Gondola attributed to people visiting Los Angeles State Historic Park is nonsense. Metro L Gold line already serves the park and connects to Union Station. If you are arriving at Union Station via the Red or Purple Lines or the regional connector, it is much easier to transfer to the Metro L train than to walk all the way outside of Union Station to the gondola station in the middle of Alameda Street. You have to leave Union Station to get to the gondola's Alameda Station. Anyone using The Gondola to access LASHP is doing it for novelty reasons. This should be counted under tourism.

Response P702-81 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P702-82 Gondola systems like this are designed for tourism and do not warrant the invasion of our neighborhoods and our LA State Historic Park. This quote is in reference to the Rio gondola build for the 2016 Olympics: "Local often remarked that these spectacularized security and infrastructure investments were "para inglês ver" – "for the English to see." This phrase dates back to 1831 when Brazil's government only pretended to stop its slave trade to appease the (suddenly righteous) British. Today, it describes projects that are superficial rather than substantive, designed to impress tourists and investors while leaving underlying problems locals face daily intact."

https://knock-la.com/from-rio-to-la-the-olympic-games-are-the-exclusion-games-c5bec60a65f1/

Response P702-82 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at

the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P702-83 This system provides views that are more or less already accessible at Dodger Stadium. Most of the route is less than 50 feet above the ground. There is a high probability of this system being mocked and labeled as "overrated" and too expensive for most tourists.

Response P702-83 As detailed in Potential LA ART Tourist Ridership in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles. Refer to Table 2-2: Proposed Project Station and Junction Details and Table 2-3: Proposed Project Tower Details of Section 2.0, Project Description, of the Draft EIR for the heights of the proposed Project stations, junction, and towers. In addition, as discussed in Section 2.0EIR, the proposed Project alignment profile is provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P702-84 Construction Traffic and Staging for Maintenance/Repairs

During deck removal at the Broadway Junction, which is estimated at 3 weeks, will all of the traffic coming south on Broadway be funneled into our residential Street Savoy Street? This is a major thoroughfare for rush hour traffic into Downtown LA's Civic Center. If Broadway is closed and opened only to residents, how will visitors be able to drive into the area?

Response P702-84 As discussed on pages 3.17-56 and 3.17-57 in Section 3.17, Transportation, and shown on pages 41 and 43 in Appendix B, Construction Assumptions, attached to the

Draft EIR, construction of deck shoring, cribbing and erection would require the full closure of Broadway at Bishops Road and of Bishops Road at Broadway for two weeks, and deck removal will require the full closure of Broadway at Bishops Road and of Bishops Road at Broadway for three weeks. As shown on Figure 3.17-11 in Section 3.17 the proposed detour route for through traffic on Broadway during these closures is Spring Street. As discussed on pages 3.17-56 and 3.17-56 and shown on Figure 3.17-11, restricted local and emergency access would be provided to allow access to adjacent properties along Broadway and to properties along Savoy Street and Cottage Home Street.

Comment P702-85 The construction documents for the Broadway Junction do not show where the drive motor would be located. Is that at ground level?

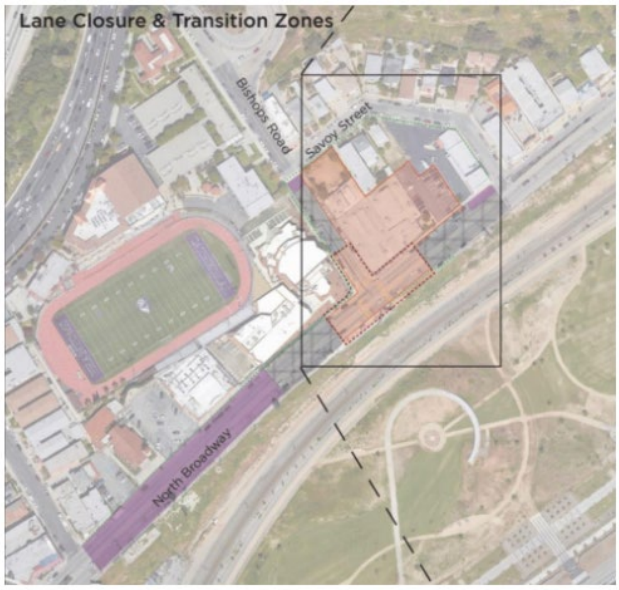
Response P702-85 Refer to Responses P702--24 through P702-27 for discussion of the drive motor at the Broadway Junction.

Comment P702-86 In the DEIR, it states, "Annual maintenance activities may require crane access at tower locations, including the potential to require the temporary closing of traffic lanes." Regular maintenance for this project will add to existing traffic congestion. Enhancing and expanding the Dodger Stadium Express service will not.

Response P702-86 Refer to Response P702-69 for discussion of how lane closures associated with maintenance activities would be temporary and how maintenance activities would not necessitate the same road closures as those necessary for the construction of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P702-87 "For multi-level stations, a strategy to change heavy machinery and parts (i.e. gearboxes, motors and etc.) will be required in case parts are broken. For instance, if a station is 4 storeys high, project proponents must design and have strategies in place to remove and deliver machinery."

(https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport_best-practices.pdf)

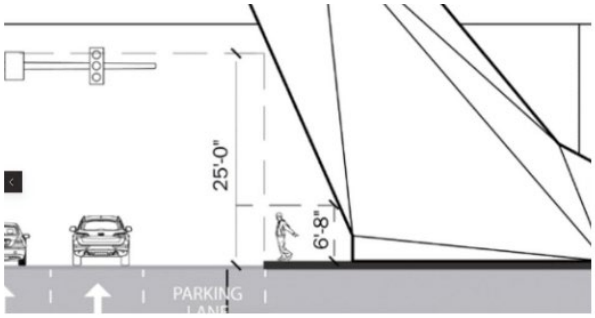


DEIR Image – Road Closures at Broadway Junction during Construction

Response P702-87 Refer to Response P702-69 for discussion of how lane closures associated with maintenance activities would be temporary and how maintenance activities would not necessitate the same road closures as those necessary for the construction of the proposed Project. This comment includes an image from Appendix B, Construction Assumptions, of the Draft EIR, which depicts the Deck Removal phase of construction of the Broadway Junction. This phase of construction would be three weeks. As discussed in Section 3.17, Transportation, and Appendix B, Construction Assumptions, of the Draft EIR, most to all lanes would remain open during the other phases of construction of the Broadway Junction, including Foundations and Columns (28 weeks), Structural Steel and Gondola Equipment Erection (38 weeks), and Vertical Circulation / Hardscape and Landscape / Interior Work (29 weeks).

Comment P702-88 Pedestrian Impact

Alpine Tower requires that a traffic lane on Alameda Street be sacrificed in order maintain a sidewalk around the base of the 200 ft tall gondola tower, which sits at the edge of the existing curb/sidewalk. The tower, however, still crowds the sidewalk by leaning into the airspace above the sidewalk. This looks like a very unpleasant pedestrian experience. The sidewalk needs to be wider, but this project is already taking space on our streets that could be used for wider sidewalks, bus lanes, and bike lanes. What is the impact of this tower, the space it needs on the street, to planned improvements to Alameda Street? Does this mean a protected bicycle lane or a bus lane can never be on this side of Alameda Street?

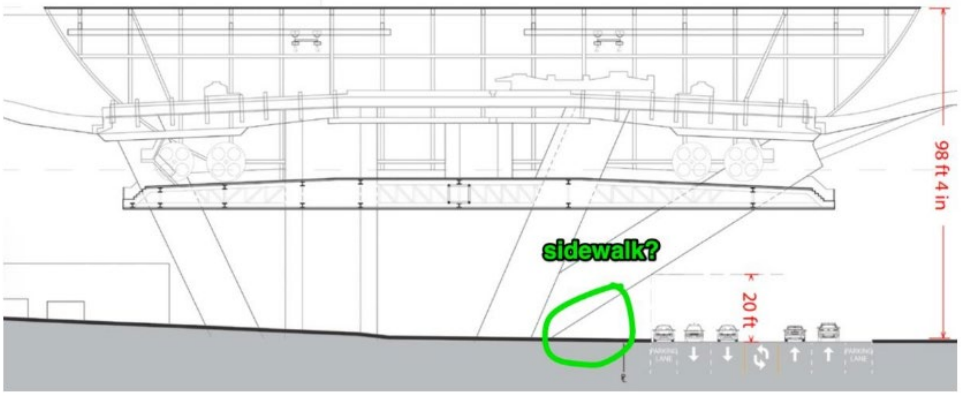


Close Up of DEIR Image Showing the Base of the Alpine Tower

Response P702-88 The Alpine Tower would not require that a traffic lane on Alameda Street be eliminated. A comparison of the Alpine Tower | Existing diagram on page 25 and the Alpine Tower | Build-Out diagram on page 31 in Appendix B, Construction Assumptions, Exhibit 1, Overview of Construction Phasing and Area Conditions, of the Draft EIR shows that the same number of travel lanes will be provided on Alameda Street after construction of the Alpine Tower is complete as there are under existing conditions.

Regarding the sidewalk width, the sidewalk adjacent to the proposed Alpine Tower location is approximately 10 feet in width. As noted on page 3.17-9 of Section 3.17, Transportation, of the Draft EIR, Alameda Street is classified as an Avenue I and is also designated as part of the Bicycle Enhanced Network in the City of Los Angeles Mobility Plan. Avenue I facilities have a desired right-of-way width of 100 feet. The existing right-of-way width of this portion of Alameda Street is greater than 100 feet. As such, the tower should not conflict with future City plans.

Comment P702-89 Broadway Junction: More information is needed on the sidewalks around the Broadway Junction, especially at the area indicated in the image below. How high is the overhead clearance of the support column, how wide is the usable space of the sidewalk? There is a bust stop located at this location on Broadway. Will this interfere with a bust stop shelter? How wide will the sidewalk be along Bishop's Road? Currently, there is no sidewalk, even though it is an official route to Dodger Stadium.



DEIR Image of Broadway Junction with Notes

Response P702-89 The sidewalk along Broadway is approximately 10 feet in width. The column would have an overhead clearance of approximately 12 feet. The support column would not interfere with a bus stop shelter on Broadway since the support column would be projecting over the Broadway and Bishops Road intersection, not over the bus stop location. The existing, partial sidewalk along Bishops Road is approximately 7 feet wide.

Comment P702-90 Parking study

Many of the parking lots identified in the parking study are inappropriately counted as parking in Chinatown that would be available to gondola visitors. These lots include parcels that are already slated for development, lots and garages that close too early for most events at Dodger Stadium, and spaces in the Union Station parking garage that are already reserved for other uses. We respectfully ask that LA ART provide an updated count of the available parking without these spaces rather than offering a vague assurance that there will be plenty of parking even if several parking lots in Chinatown are redeveloped.

The parking lots that are already slated for redevelopment include the lots that LA ART labaeled as Lots 21, 24, 28, and 44 in their map below.

Parking Lot Map Taken from DEIR

- Lot 21

Count “Lot 45”.

https://la.urbanize.city/post/county-owned-parking-lot-chinatown-eyed-development

https://www.lachinatowncc.org

"We came together with like-minded people to turn Lot 45 into housing that will serve the Chinatown community. We are happy to announce that at the request of Supervisor Hilda Solis 1.5M was given to LA County by Representative Gomez to do a study on how to turn Lot 45 into affordable housing in Chinatown. We are aiming for 400 hundred extreme low-income to low-income units to be placed on Lot 45. We will share more details as things continue to develop. It was a great day today! May 4, 2022 "

- Lot 24 – 643 N Spring St.

https://la.curbed.com/2018/4/19/17254338/studio-gang-los-angeles-chinatown-tower

https://planning.lacity.org/odiscaseinfo/document/NDU1NzA0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit

- Lot 28 – 717 N Hill St.

https://la.urbanize.city/post/411-apartments-retail-pitched-chinatown

"Eight-story building slated to replace parking lot on Hill Street"

"The proposed project is among the largest new housing complexes proposed in Chinatown, eclipsing only by the 725-unit College Station development near Los Angeles State Historic Park."

- Lot 44 – 211 Alpine St.

https://la.urbanize.city/post/developer-retools-chinatown-project-toc-guidelines

- In addition, Lot 48 on the map is Los Angeles State Historic Park's parking lot, which closes at sunset. This lot should not be included unless the park has committed to staying open until at least 12:30 am for every game and event at Dodger Stadium to allow people to remove their vehicles from their gated parking lot, which seems unlikely.
- Lot 37, the Metro Chinatown Station Parking Garage, should also not be included. Residents at Metro Lofts senior apartments, including seniors with mobility issues, rent spaces there monthly, and already have trouble finding parking there. They pay for the right to park in that lot, but it doesn't guarantee them a space.

Response P702-90 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the

Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. As shown in Table 1 on page 7 of the Parking Study, 6,876 spaces were counted in off-street lots and garages within the parking study area, of which 32% were occupied at 8:00 PM on the game day and 31% were occupied at 8:00 PM on the non-game day and approximately 4,700 spaces were available. All existing, publicly available off-street parking lots and garages within a ½-mile walkshed around the Alameda Station and Chinatown/State Park Station were included in the Parking Study for completeness. Refer to Response P702-92 for a discussion of how these numbers would change if the off-street lots identified in the comment were to be excluded from the analysis.

Comment P702-91 There are several other parking garages in Chinatown that currently close early or are closed on holidays, and their inclusion in the count of available parking for gondola patrons is questionable unless those owners/operators have stated a willingness to modify their operations to serve gondola riders.

Response P702-91 Refer to Response P702-90 for a discussion of the Parking Study. As stated on Page 10 of the Parking Study:

> Parking management strategies and specific implementation steps will be further detailed in a parking management plan prepared in the future in collaboration with the City of Los Angeles, who would be the implementer of any on-street parking management strategies. This process would gather robust feedback from community stakeholders to inform its development. Preparation of a detailed parking management implementation plan, and implementation of its recommendations would precede the operations of the proposed Project.

The parking management plan would include identification of specific partnerships with parking owners/operators and businesses and, as such, cannot be fully detailed until closer to proposed Project operations. In addition, robust feedback from community stakeholders would inform development of the plan, to ensure the parking management plan is designed to alleviate any potential localized increase in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station. A preliminary version of the parking management plan has been prepared, however, and is available on the proposed Project's SB 44 website.[39]

Comment P702-92 Union Station Parking Count: Spaces reserved for Metro Emergency Vehicles, Facilities Maintenance, Maintenance Carts, Metro Board and Staff, 10 Minute Waiting Zones, Childcare pickup and drop off, and other reserved uses appear to have been

[39] Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

counted as available parking for gondola customers. We ask for an accurate count of available parking that does not include spaces reserved for other uses.

Response P702-92 Refer to Response P702—90 for a discussion of the Parking Study. All existing, publicly available off-street parking lots and garages within a ½-mile walkshed around each proposed Project station was included in the parking study for completeness. If the off-street lots identified in Comment P702-90 and the reserved parking spaces at Union Station/Metro Gateway identified above in Comment P702-92 were to be excluded from the analysis, the total off-street space count would be 5,697, of which 32% were occupied at 8:00 PM on the game day and 31% were occupied at 8:00 PM on the non-game day (with approximately 3,900 spaces available). This does not change the conclusion in the Parking Study that there is a substantial amount of unoccupied off-street spaces available with little difference in off-street parking occupancy between game days and non-game days.

Comment P702-93 Flaws in pre-COVID Calibration

- The parking study uses 2012 data at Union Station to calibrate the September 2021 survey to estimate the ridership that would have existed had there not been a COVID-19 pandemic. This presumes that the park-and-ride activity at Union Station did not increase between 2012 and 2019, which is inconsistent with their claim that there will be increased demand for the gondola between 2028 and 2040 due to the build out of the public transit network. The Expo Line (to USC and to the beach) opened on April 28, 2012, and the Foothill extension of the Gold Line to Azusa opened on March 5, 2016. Yet, no adjustments were made to account for the differences in the public transit system that should have attracted more riders between 2012 and 2019.
- The 2012 calibration using parking data at Union Station does not account for increased activity at Cathedral High School, which only returned to pre-pandemic levels in September of 2022. In September 2021, the high school did not have football games with full attendance, if at all. But in 2022, football games and events at the school resumed with full attendance, including dances, theater performances, and other sporting events, which often take up all of the parking in our neighborhood on Savoy Street, Bishops Road, Cottage Home Street, and along Broadway. At peak times, such as Friday night football games, which would have been captured in the September 2021 survey were it not for the pandemic, people park in front of fire hydrants, at street corners, and block driveways. None of the street parking in our neighborhood and along Broadway between Solano Avenue and Bernard Street should be counted in this parking study as "available parking." On Friday, September 16, 2022, all of this parking was fully occupied for a football game at Cathedral High School.

Parking By Cathedral High School, Friday, September 16, 2022

- Our neighborhood is already burdened by traffic at Cathedral High School on an almost daily basis, especially during student pick up and sporting events. Parking enforcement takes more than 1 hour to arrive, even when our driveways are blocked. This is both a nuisance and a safety hazard for residents.

Response P702-93 Refer to Response P702-90 for a discussion of the Parking Study. The comment states that the Parking Study uses 2012 data at LAUS to calibrate the September 2021 survey to estimate the ridership that would have existed had there not been a COVID-19 pandemic. This is not accurate. The adjustment to reflect non-COVID conditions was not in the estimation of ridership, but rather in the estimation of utilized parking spaces. The 2012 parking counts at LAUS were the only available pre-COVID parking counts in order to calculate an adjustment factor. However, the E Line (Expo) and the L Line (Gold) expansion projects referenced in the comment are unlikely to have caused a substantial change in park and ride demand at LAUS, as the E Line (Expo) does not directly serve LAUS, and the park and ride patterns for the Azusa extension of the L Line (Gold) line are more likely to increase parking at Azusa and along L Line stations towards the end of the line, with riders traveling by transit to LAUS rather than parking at LAUS. Additionally, the use of the 2012 data and the overall COVID-19 calibration factor were reviewed and determined to be reasonable by both staff of both Metro's and the Los Angeles Department of Transportation (LADOT)'s parking group. As shown in Table 2 on page 8 of the Parking Study, 3,417 on-street parking spaces were counted within the parking study area, of which 59% were occupied at 8:00 PM on the game day and 58% were occupied at 8:00 PM on the non-game day (including the application of the COVID-19 calibration factor) and approximately 1,400 spaces were available.

Activities at Cathedral High School affect the surrounding street parking, as do events at the Los Angeles State Historic Park, events at local businesses, and events in private homes. Streets in the vicinity of Cathedral High School and the Savoy Steet neighborhood were included in the parking survey for completeness. If the streets identified above in Comment P702-93 were to be excluded from the analysis, the total on-street space count would be 3,160, of which 62% were occupied at 8:00 PM on

the game day and 61% were occupied at 8:00 PM on the non-game day (including the application of the COVID-19 calibration factor) with approximately 1,200 spaces available. This does not change the conclusion in the Parking Study that there is a substantial amount of unoccupied on-street spaces available with little difference in on-street parking occupancy between game days and non-game days.

Comment P702-94 Much of the paid parking in Chinatown is currently inexpensive street parking or parking lots that charge $5 all day. This will change if the gondola patrons choose to park in Chinatown to ride The Gondola to Dodger Stadium. LA ART has no control over the mode of transportation that their customers use to access their system, but it is a foreseeable outcome that many of The Gondola's customers will choose to drive rather than take transit to its stations. Metro's recent challenges attracting riders back to transit following the sharp decline during the COVID-19 pandemic have been well publicized and lead to the establishment of the transit ambassadors program. Because the gondola system is marketed as a futuristic, luxury transit option, it's highly likely that most riders who would ride the private gondola, but not take the free Dodger Stadium Express, would opt drive to a gondola rather than take public transit for their entire journey.

Response P702-94 Refer to Response P702-90 for a discussion of the Parking Study. Refer to Response P702-65 for a discussion of the estimated non-auto mode of access of 67.5%. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As discussed in Section 3.17, Transportation and noted on page 12 and shown on the table following page 22 of Ridership Model Development in Appendix N, Transportation Appendices, of the Draft EIR, the automobile mode of access to the proposed Project for choice riders was assumed to be higher than for current Dodger Stadium Express riders.

Comment P702-95 If Chinatown is turned into a park-and-ride lot for The Gondola, businesses in Chinatown that need inexpensive street parking for their customers, especially the mom and pop legacy businesses, will be hurt. Customers may decide to go elsewhere to buy pastries or herbs, rather than to deal with the hassle and expense of parking in Chinatown. The last full-service grocery stores in Chinatown closed in part due to parking fees.

- "Parking and a new landlord were also a factor for Ai Hoa Market, which is closing and relocating to South El Monte by the end of the year. Linda Hang, 41, the daughter of the market's owner, says their business suffered when the property owner started charging them several thousand dollars a month for use of the parking lot."

  (https://latimes.com/calfiornia/story/2019-09-22/chinatown-gentrification-grocery)

Response P702-95 Refer to Responses P702--90 and P702-93 for a discussion of the Parking Study. The parking survey tables presented in Attachment A - Parking Counts and the parking occupancy maps presented in Attachment B – Parking Data Maps in the Parking Study shows that the vast majority of off-street parking lots in Chinatown are estimated to be occupied at a level of less than 40 percent and an overall average of only about 15 percent (including the COVID adjustment factor), with over 1,800 available unoccupied spaces at 8:00 PM. Street parking in Chinatown was found to be occupied at a higher rate, roughly 60% occupied at 8:00 PM, with approximately 200 available spaces. Thus, there is available parking in Chinatown in the evening, which is when the vast majority of Dodger games take place. Refer to the Parking Study for a discussion of the proposed Project's parking management plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, including how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P702-96 Green House Gas (GHG) Emissions

The Gondola Project involves the construction of massive concrete towers and stations to support this new infrastructure. The DEIR does not consider the GHG emissions from the manufacture of concrete that will be used in The Gondola Project. The manufacturing of concrete is a major source of GHG emissions (https://www.nature.com/articles/d41586-021-02612-5). In comparison, the preferred alternative studied in the DEIR of expanding the Dodger Stadium Express shuttle buses does not require the building of new concrete structures. Nor are any new roads proposed.

Response P702-96 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for a discussion of the proposed Project's potential greenhouse gas emissions. The Draft EIR's analysis is consistent with guidance from the California Natural Resources Agency and the SCAQMD-recommended model, CalEEMod®. The CalEEMod® model was developed by SCAQMD in coordination with other California air districts under the direction of the California Air Pollution Control Officers Association (CAPCOA). Sources of the model's calculation methodologies and default data include SCAQMD-specific emission factors, USEPA AP-42 emission factors, EMFAC2021 for vehicular emissions, and studies commissioned by the California Energy Commission (CEC) and California Department of Resources Recycling and Recovery (CalRecycle). Lifecycle-type impacts

related to the manufacture of the materials used during construction (such as concrete) are outside the scope of a standard CEQA analysis. The California Natural Resources Agency has found that lifecycle analyses are typically not warranted for project-specific CEQA analysis for a variety of reasons, including lack of control over some sources and the potential double-counting of emissions. Because the origin of the raw materials purchased is frequently not known and manufacturing information for those raw materials may also not be available, calculation of lifecycle emissions would be speculative, and a lifecycle analysis is not warranted.[40] Therefore, consistent with guidance from the California Natural Resources Agency and the model recommended by CAPCOA and SCAQMD, the Draft EIR does not include GHG emissions associated with concrete manufacturing. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, in order to meet service frequencies similar to the proposed Project, a minimum of 6 buses loading simultaneously would be required, which cannot be physically accommodated in the existing location for the Union Station Dodger Stadium Express, and an off-site loading facility would need to be developed to accommodate the new level of bus activity. In addition to a new off-site loading facility, operational changes would be required on surrounding streets to accommodate the increased congestion from the TSM Alternative. Additional loading facilities would also be required at Dodger Stadium, including dedicated bus only lanes, to accommodate the increased level of Dodger Stadium Express service. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P702-97 The GHG emissions estimates for The Gondola are estimated using the flawed VMT analysis provided by Fehr & Peers. (See Traffic section for more information.)

Response P702-97 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions,

[40] California Natural Resources Agency (CNRA). 2009. Final Statement of Reasons for Regulatory Action. Available at: https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf. Accessed August 2023.

and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model – including the VMT analysis – which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P702-98 The GHG emissions estimated for The Gondola assume that there is funding to pay for energy sourced from LADWP's Green Energy program. Because LA ART has publicly stated that a funding plan is still under development, this is a flimsy assumption. Therefore, the DEIR must analyze an equally, if not more likely scenario, which is that LA ART may need to purchase energy from conventional LADWP sources if The Gondola suffers cost overruns, which happens more often than not with transit projects, and calculate GHG emissions under this scenario.

It is confusing whether this project is committing to using air conditioning in the cabins or not, which should impact GHG emissions. Air conditioning may also impact usability of the system in the summer because it may be too dangerous to allow people to ride in the cabins with windows that don't open.

Response P702-98 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions, of the Draft EIR, for a discussion of the proposed Project's greenhouse gas emissions, including the GHG emissions associated with electricity demand, concluding that the proposed Project will have a less than significant impact on GHG emissions. In fact, due to the VMT reductions associated with the proposed Project, the proposed Project results in a net reduction of GHG emissions and helps advance local and state climate policies. See Section 3.8.4 and Table C-1 through Table C-4 provided in Appendix J for additional discussion. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment by the proposed Project to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, to the proposed Project has added this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR. The proposed Project would implement the Project Design Feature as part of the Project's operations in accordance with the Mitigation Monitoring and Reporting Program set forth in Section 7.0, of this Final EIR. The estimated electricity demand of the proposed Project encompasses the demand for the entire gondola system (including

potential cabin air conditioning). Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including power for the proposed Project cabins. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment P702-99 On page 60 of Appendix J – GHG technical Report, footnote #4 states, "Estimated annual electricity usage provided by SJC Alliance and was reduced by the amount of electricity anticipated to be used by the park amenities." And "Estimated electricity usage (kWh/yr):6,881,212." We ask that explanation be provided as to how the estimated electricity usage was calculated. Was air-conditioning in the cabins included in this figure? 6.8 GWh is enough to power approximately 1000 homes for an entire year in the LADWP service region (according to LADWP average of 545 kWh/month per home). Much of the gondola operations near capacity will happen during peak power demand times, 4pm – 9pm. We are concerned that this concentration of new power demand in our neighborhood will put additional strain on our electric grid, and that's with very few electric cars in our neighborhood charging on the grid. There were multiple flex alerts in the summer of 2022 during which residents in Echo Park and Los Feliz lost power for many hours due to overwhelmed equipment.

Response P702-99 The Draft EIR evaluated the proposed Project's potential energy impacts in Section 3.06, Energy, with supporting analysis in Appendix H, Energy Technical Report, and demonstrated that impacts to energy would be less than significant. The Draft EIR's estimated electricity demand encompassed demand for the entire gondola system and the overall operation based on the ridership assumptions included in the Draft EIR. See Table 3.17-4 on page 3.17-35 of Section 3.17, Transportation, and pages 6 – 38 of Appendix N, Transportation Appendices, of the Draft EIR. As described in Section 3.06, the estimated electricity use considers gondola and non-gondola system components, including potential electricity use for cabin air conditioning. The gondola portion of the electricity use was estimated based on several use cases with varying levels of activity, while the non-gondola portion of the electricity use considers the ancillary uses such as escalators and emergency lights. Collectively, the gondola and non-gondola components and their associated power requirements form the estimated annual electricity usage reported in Section 3.06. Refer to the *Gondola Operating Scenarios and Power Technical Memorandum* from SCJ Alliance, dated February 22, 2022, for the underlying power requirements for each operating scenario used to inform the analysis of the proposed Project's energy impacts.[41] As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Draft EIR demonstrates that the proposed Project would not have a substantial impact on peak

[41] SCJ Alliance Consulting Services. 2022. Gondola Operating Scenarios and Power.

and base period demands for electricity and other forms of energy. In addition, as discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. As discussed in Section 3.19 of the Draft EIR, the proposed Project was found to not have a substantial impact on local or regional energy supplies or require additional capacity to be constructed. Additionally, as stated in Section 3.06, Energy, of the Draft EIR, while the 2.5 MW of power required for operation of the proposed Project may occur during high-peak energy demand periods, the value represents a very small portion of the projected 6,500 MW peak demand for LADWP and therefore does not create a significant impact. As such, it is unlikely that the power demand created by operation of the proposed Project would meaningfully contribute to potentially issued flex alerts for the region.

The comment states a concern about EV charging and the additional strain that would potentially be placed on LADWP's power supply. As LADWP expands its power output while simultaneously planning to incorporate greater renewable resources into its power mix, LADWP's 2022 Strategic Long-Term Resource Plan (SLTRP) considers expanded EV charging capacity of the region. The LADWP's 2021 load forecast is used to project customer demand for electricity over the next 20 years, and the modeling in the SLTRP set the capacity requirements to ensure that LADWP has sufficient capacity to meet customer load while accommodating development like increased EV charging. The 2017 LADWP SLTRP is referenced in Section 2.0, Project Description, of the Draft EIR, and was the most current version available at the time the Draft EIR was prepared.

Additionally, as noted in Section 2.0, Project Description the Draft EIR, the proposed Project would include the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Inclusion of backup battery power is provided to create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro's 2019 Metro Climate Action and Adaptation Plan measure to "increase redundancy in power systems, installing additional backup generators." Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have battery backup storage to use if electric power is disrupted.

Comment P702-100 Ridership estimates are provided on page 65. Without any estimate as to what tickets may cost for tourists and anyone outside of the Community Access Program Area (Historic Cultural North Neighborhood Council boundaries, which includes Chinatown, Solano Canyon, El Pueblo, Victor Heights, and the William Mead area), there cannot be a ridership estimate. The assumption being made is that ridership is

price insensitive, which is false. This is another reason why this DEIR has been released prematurely, before the project has been adequately evaluated for feasibility, including financial feasibility. In the absence of an estimate for ticket prices, there should at the very minimum be a range of ridership numbers presented, not just a single number. As mentioned in other sections of this comment letter, there are several other issues that will affect ridership that are not related to ticket prices such as management of queues and the ticket reservation system.

Response P702-100 As detailed in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles. The HR&A Analysis of Potential LA ART Tourist Ridership is included in Appendix N. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation, including the ticket reservation system. In addition, the Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of how employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P702-101 The GHG emissions reductions are overstated and overly optimistic. This system still consumes electricity that has to be generated somewhere. How much electricity will be wasted if this system is running empty most of the day? This is not disclosed in the Draft EIR. At maximum capacity, this system is estimated to use 2.5 megawatts of energy, which is approximately enough electricity to power 2000 homes. Does that include air conditioning for the cabins during the summer months? This is not clear in the DEIR.

Response P702-101 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions, of the Draft EIR, for a discussion of the proposed Project's greenhouse gas emissions, including the GHG emissions associated with electricity demand, concluding that the proposed Project will have a less than significant impact on GHG emissions. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Projects energy demand, which would be less than significant. Importantly, it was found that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Refer to Responses P702-96 through P702-99 for a discussion of the anticipated electrical usage from the proposed Project and greenhouse gas emissions reductions analysis. Refer to Section 2.06, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership.

As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Draft EIR demonstrates that the proposed Project will not have a substantial impact on peak and base period demands for electricity and other forms of energy. The proposed Project was found to not have a substantial impact on local or regional energy supplies or require additional capacity to be constructed. Refer to Response P702-98 regarding air conditioning in the cabins.

Additionally, as noted in Section 2.7.8, Power Requirements, of the Draft EIR, the proposed Project would involve the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Inclusion of backup battery power is noted in Section 2.7.8, Power Requirements, of the Draft EIR to create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro's 2019 Metro Climate Action and Adaptation Plan measure to "increase redundancy in power systems, installing additional backup generators." Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have backup battery storage to use if electric power is disrupted.

Comment P702-102 Pg 104 – Disagree with many conclusions in the table.

- #1 – This project will be damaging to small businesses in Chinatown that don't have parking for their customers.'
- #2 – This is private transportation, not public transportation.
- #6 – If The Gondola is a last mile option to access Elysian Park, then why do people need another last mile option, a mobility hub with bicycles at Dodger

Stadium, to access Elysian Park? This is because The Gondola is NOT a last mile option and cannot be described as such. Users can only enter and exit the system at intervals that match those of light rail. Light rail is not a last mile option and neither is The Gondola. LA ART must stop describing The Gondola as a last mile option. Buses are a last mile option.

Response P702-102 The comment includes a characterization of Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy), of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. Table C-3 outlines various Connect SoCal (2020-2045 RTP/SCS) goals and provides a consistency analysis for the proposed Project. Regarding #1, refer to Response P702-95 for a discussion of the proposed Project's parking management plan and potential partnerships with and benefits to local businesses in Chinatown. Regarding #2, refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Regarding #6, as discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access, including to Dodger Stadium and Elysian Park via the mobility hub at the Dodger Stadium Station. The comment states that access to the system will be at intervals that match those of light rail. The cabins on the gondola system will operate continuously with greater frequency than light rail arrivals to and departures from the proposed Project's stations.

Comment P702-103 Pg 105 – Disagree with many conclusions in the table.

- #7 – This project does not adapt to climate change in that during the summer months, the gondola system will be susceptible to shutdowns during heat waves. Electric buses also may need to shut down during heat waves, but can continue running longer. There are not as many safety issues with running electric buses when it is hot outside.
- #8 – In other words, this project is being tested on communities of color who have already been divided by transportation infrastructure by redlining.
- #10 – This project destroys habitat at the entrance of LA State Historic Park.

Response P702-103 The comment includes a characterization of Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy), of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. Table C-3 outlines various Connect SoCal (2020-2045 RTP/SCS) goals and provides a consistency analysis for the proposed Project. Regarding #7, the proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts. Refer to Section 3.06, Energy, and Appendix H, Energy Technical

Report, of the Draft EIR for evaluation of the proposed Project's potential energy impacts, which would be less than significant. Additionally, as noted in Section 2.7.8, Power Requirements, of Section 2.0, Project Description, of the Draft EIR, the proposed Project would involve the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Backup battery would create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro's 2019 Metro Climate Action and Adaptation Plan measure to "increase redundancy in power systems, installing additional backup generators." Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have battery backup storage to use if electric power is disrupted. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety and operations features of the proposed Project. Regarding #8, refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. Specifically, the Draft EIR addressed topics related to environmental justice, including the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution. The Draft EIR also considered and analyzed the proposed Project's consistency with land use policies related to environmental justice. Regarding #10, refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources, of the Final EIR for discussion of how the proposed Project would remove 0.24 acres of wooded habitat at the Los Angeles State Historic Park and would result in a marginal short-term reduction of suitable tree habitat, but the replacement of trees proposed for removal would more than offset any potential reduction of habitat associated with the proposed Project in the long-term.

Comment P702-104 Wildfire Safety

The report on wildfires in the DEIR does not address the impact of the gondola on firefighting – in particular water dropping helicopters. Our neighborhood has frequent brush fires on Radio Hill, especially during the summer. Water dropping helicopters often fly very low over our homes. Would their flight paths be impacted by the gondola over our neighborhood?

Water-Dropping Helicopter Over Savoy Street & Radio Hill

August 2022

Water-Dropping Helicopter Over 455 Savoy Street, August 2022

Water-Dropping Helicopter Over 451 Savoy Street, August 2022

Response P702-104 Refer to Appendix I, Firefighting Helicopter Response Memo, of the Final EIR and Appendix O, Airspace Analysis, of the Draft EIR for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project. As discussed in Appendix I, firefighting operations would consider the proposed Project components, which will be marked with red aviation lights and included on navigational charts. Further, the surrounding area includes multiple obstacles that a pilot must avoid, including trees, poles, antennas, and buildings. Because pilots are required to see and avoid all obstacles—which would include the proposed Project—and operate within the limitations of the helicopter performance specifications, helicopter flight paths and firefighting efforts would not be impeded as a result of the proposed Project.

Comment P702-105 Environmental Justice

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P702-105 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P702-106 As residents, we are being asked to shoulder the burdens and negative impacts of this project in order to serve a greater good, but we don't believe the case has been made that there is a benefit to the broader community. Traffic will not be helped, it will just be displaced into our communities, according to a UCLA Mobility Study

[https://www.stopthegondola.org/ucla-study]

Response P702-106 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
Jiaqi Ma
Director, UCLA Mobility Lab
Faculty Associate Director, UCLA Institute of Transportation Studies

Comment P702-107 Need to fix the basics, invest in other less costly and less invasive/destructive options before investing all of this time and resources into this project that does not benefit our communities. Add bike lanes, fix sidewalks, build an escalator and staircase up the hill to Dodger Stadium. We support the preferred alternative, the Dodger Stadium Express bus service, but with modifications including electrification and more pickup locations, similar to the shuttle buses to the Hollywood Bowl or the LAX Flyaway bus. With The Gondola, LA ART is shifting the burdens of traffic and parking onto our communities and Chinatown. This is a huge injustice, as we are already burdened with the 110 FWY and the Hill Street/Civic Center offramp cutting through the communities. Our businesses need more support, not for this gondola to drive their existing customers away because they can't find parking.

Response P702-107 .

Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be

underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations..

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified..

Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and

other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P702-108 Our last full-service supermarket closed, in part, because the fee for their parking was going to be increased. If this gondola project is approved, we could soon find it impossible to find street parking. The paid parking lots, instead of having signs that say "$5 all day" will say "$20 all day". This would be extremely detrimental for elderly people, whose families come to visit them on weekends, go to restaurants and bring them groceries and supplies. It would also hurt many disabled people who can park at parking meters for free. In 10 years, you might see many of our legacy and community-served businesses close down and replaced with businesses that cater specifically to tourists. These are the unintended consequences of allowing Frank McCourt to turn Chinatown into Dodger Stadium's parking lot.

- "Linda Hang, 41, the daughter of the market's owners, says their business suffered when the property owner started charging them several thousand dollars a month for use of the parking lot." https://latimes.com/california/story/2019-09-22/chinatown-gentrification-grocery

Response P702-108 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Response P702-107 for discussion of how parking is not required to be analyzed under CEQA or the TAG but the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. The Parking Study determined that even with the addition of proposed Project vehicles parking in the area studied, publicly available parking on a game day would still be substantial, with an estimated 43 percent parking occupancy across the two half-mile station walksheds, and over 3,900 off-street parking spaces available to the community. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P702-109 Chinatown has almost no bike lanes. This is probably because our communities were redlined and used as shortcuts for people driving into Downtown Civic Center. Our major north-south streets would have to lose a lane of traffic in order for there to be a bike lane, and this would impact traffic for commuters in and out of Downtown. Hill Street is like an onramp/offramp for the 110 FWY.

Response P702-109 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins would accommodate bicycles.

Comment P702-110 The draft EIR does not include an inventory of the trees that would have to be removed for this project. It appears that oak trees near a hill in the park, which files only 26 ft above the ground at that point, would have to be cut down. Aren't oak trees protected?

Response P702-110 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of tree removals required due to the proposed Project within Los Angeles State Historic Park. Refer to Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix K.1, Updated Tree Report, of this Final EIR for a tree inventory report detailing the removal and replacement of trees for the proposed Project. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as

part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment P702-111 Contrary to what the developer says, this gondola project would have a dramatic, negative impact on our experience in the park. It would clutter our open skies. It would place an imposing 98 ft tall gondola station at the entrance of the park. As you walk into the park, 5-ton, 40-person gondola cabins would fly 40 ft over you. That would be your first experience as you walk into the park.

Response P702-111 Refer to Response P702-56 for a description of the location and design of the Chinatown/State Park Station. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. ANSI B77.1 requires a vertical clearance of eight feet above grade where pedestrians are present. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for a discussion of the proposed Project's aesthetic impacts, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the

Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P702-112 Destruction of the entrance to LA State Historic Park, including the destruction of the grove of trees and the end of the riverbed at the entrance of the state park, in order to locate restrooms and concessions, is a huge environmental injustice.

Left: Google Earth View Annotated with LA ART's Changes to Park Entrance

Right: Proposed Changes to LASHP Entrance – Image Taken from DEIR

Response P702-112 Refer to Response P702-110 for a discussion of tree removal at the Los Angeles State Historic Park, including coordination with California Department of Parks and Recreation regarding replacement. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, "The BSA does not include water features falling under CDFW jurisdiction."

Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment P702-113 LASHP was a hardwon environmental justice victory. The Gondola could be iconic, but in a very bad way

(https://www.latimes.com/california/story/2020-11-26/proposed-aerial-tram-for-dodger-fans-ignites-controversy-at-los-angeles-state-historic-park). Allowing this gondola to invade our park would send a clear message that the park does not belong to the community; it belongs to a billionaire developer. The gondola's massive towers and stations would service as an iconic monument to injustice. Unlike the Metrocable in Medellin, which was considered symbolic of the government's investments in public infrastructure, the LA ART Gondola would be seen as a betrayal of our communities.

Screenshot of Image in the Park – Monument to the Creation of the Park

(https://lastatehistoricpark.org/art-in-the-park/)

Response P702-113 Refer to Response P702--111 for discussion of how, with the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at

the park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P702-114 LA ART states repeatedly in the DEIR that The Gondola flies over the "western edge" of the park, but that's completely false. It travels over the heart of the park, over a very popular hill where people play and gather. Kids roll down the hill like logs. People sit and dogs play with each other. How are you supposed to relax and enjoy yourself if every 13 to 25 seconds, there's a massive cabin full of people flying less than 26 feet over you with people literally looking down on you?

Photo – Popular Hill at LA State Historic Park

The LA ART Gondola would fly 26ft over this hill.

Close Up of Image in DEIR – Rendering of Gondola Cabin Flying Over Popular Hill at LA State Historic Park

For residents who live in a dense urban environment, LA State Historic Park is an escape and a hospitable environment, especially for those who have dogs. Walking a dog on Chinatown streets can be unpleasant. Sidewalks are narrow, have broken glass, have random garbage/food on the ground. The park is a place where people gather and dogs can interact with other dogs. It's a place where friends and families can get away and play. To add a massive gondola station at the entrance of LASHP that people will have to navigate around or under, and gondola cabins flying very low, as low as 26ft overhead, is a huge invasion and incompatible with current uses of the park. The gondola cabins, with their advertising on the exterior, will also be visually invasive.

Response P702-114 Refer to Response P702--111 for discussion of how, with the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, which includes views from a cabin over the park, providing a new and unique perspective of the park, and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Signage proposed for the

exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

Comment P702-115 The construction of the Chinatown / State Park Station would close the main pedestrian entrance and the general area by that entrance for over a year. People will either need to drive or will cross Spring Street farther north, where there is no crosswalk.

Response P702-115 As detailed in Section 3.11, Land Use and Planning, Section 3.17, Transportation, and Appendix B, Construction Assumptions, of the Draft EIR, during construction of the Chinatown/State Park Station, while a portion of the western sidewalk would be closed, a covered pedestrian sidewalk on the roadway along the western side of Spring Street would be provided to maintain pedestrian access.

Comment P702-116 Don't hold the bridge hostage.

- LA ART is offering to build a bridge between Broadway and LA State Historic Park, but there is still no funding plan or budget for the gondola, so can they even contribute funds to a bridge? Tickets will apparently be free for Dodgers fans. There is no estimated ticket price for tourists. Apparently Frank McCourt intends to donate this project to Climate Resolve and is not going to pay for or finance this project. Who, then, is going to pay for it, and will the eventual owners be able to contribute funds to build the bridge?
- The Gondola has nothing to do with the bridge. There is no reason to link these two projects together.
- We want the bridge, not the gondola. We currently have to walk almost a half mile to walk to the park, even though we are across the street. We ask Metro, city, and state leaders to actively seek funding for the bridge from Broadway into LA State Historic Park because it will actually improve equitable access to parks for "underparked" communities, unlike the gondola, which only provides access to the Dodger Stadium parking lot.

Response P702-116 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally

cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which provide access to more than the Dodger Stadium parking lot, and would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P702-117 LA ART claims that The Gondola provides access to parks to "underparked" communities, but the parking lot at Dodger Stadium is not Elysian Park. Elysian Park is a sprawling hilly park. It is disingenuous to claim that the gondola provides access to Elysian Park when it drops people off at the far eastern edge of the parking lot.

LA ART's Route Map Laid Over google Map Showing Elysian Parl. Elysian Park is big, hilly, & tough to access from the gondola station. What LA ART calls Elysian Park on their map is actually Parking Lot 2 at Dodger Stadium.

Response P702-117 As discussed in Section 2.0, Project Description, of the Draft EIR, at page 2-7, Elysian Park is the second oldest and largest park in the City and features hiking trails, a bike path, and various recreational and event facilities. The Dodger Stadium Station would be located on private property adjacent to Dodger Stadium in a portion of the existing parking lot in the southeast portion of the Dodger Stadium property near the Downtown Gate. The Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating, and a mobility hub to provide connectivity to Elysian Park and the surrounding communities where outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods.

Comment P702-118 Our communities already suffer from decisions of the past, including the decisions to divide Solano Canyon with the 110 FWY and split Chinatown with the Hill Street offramp, which is basically a shortcut for the benefit of Downtown and City Hall employees. Now, with this project, LA ART is proposing to cut through our communities' skies, the airspace over our homes and the state park that is an asset from decades of advocacy by both the Chinatown community and park activists.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, and how the proposed Project would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P702-119 Wildlife

We are concerned that the noise from the Broadway Junction was not evaluated in terms of scaring away wildlife in our neighborhood, especially small birds. We see many small birds in our neighborhood because we are sandwiched between Elysian Park and LA State Historic Park.

Response P702-119 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant. The Draft EIR addressed impacts to biological resources, including special status bird species from noise, in Section 3.04, Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. As discussed on page 3.1-19, in Section 3.04, potential indirect impacts could include potential displacement of birds or bats from foraging, nesting, or roosting areas due to disturbance from noise and human activity associated with operation of the proposed Project. However, because the proposed Project would operate in a highly disturbed urban area, birds and bats are unlikely to

be impacted by the relatively minor change in environment. Thus, the analysis in the Draft EIR determined that impacts to special status species, including bird species, would be less than significant with incorporation of Mitigation Measure BIO-B to reduce potential project-related impacts to nesting birds. Further, as discussed in Appendix G, Supplemental Biological Resources Report, common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species is not expected. Refer to Responses S1-4 through S1-15 for a discussion of the additional PDFs incorporated as part of the proposed Project to provide additional environmental benefits to biological resources. For example, as discussed therein, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities.

Comment P702-120 It appears that mature trees will need to be cut down at the entrance of LA State Historic Park. We are concerned at that end of the park. But cutting down those trees, less wildlife will be at the southern entrance of the park, which is the most accessed portion for people arriving on foot or by transit.

Response P702-120 Refer to Response P702-110 for a discussion of tree removal at the Los Angeles State Historic Park, including coordination with the California Department of Parks and Recreation regarding replacement. As discussed in Section 3.04, Biological Resources, of the Draft EIR, the BSA surrounding the proposed Chinatown/State Park Station consists of paved roadways, sidewalks, the elevated Metro L Line (Gold) structure, and buildings. In addition, "a review of historical aerial imagery indicates … that" trees "at the Chinatown/State Park site and under the portion of the alignment crossing over the Los Angeles State Historic Park were installed in 2016 during construction of the southern entrance to the Los Angeles State Historic Park, as part of a tree planting program." Therefore, these trees are only approximately seven years old. Further, as discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, given that the trees proposed for removal are primarily non-native tree species, the quality of wildlife habitat provided by these trees is relatively low, providing a relatively small amount of wooded habitat at the western end of the Los Angeles State Historic Park, especially relative to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, Dodger Stadium Property, and Point Grand View Park. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. As the commenter recognizes, this area is already frequently disturbed by humans, further rendering the area unsuitable for the presence of wildlife. As discussed in Section 3.11, Land Use, of the Draft EIR, the Chinatown/State Park Station would be located in the southernmost portion of the

Los Angeles State Historic Park approximately 500 feet from the Metro L Line (Gold) Station and surrounding existing and approved land uses include a mix of residential, commercial, and industrial that naturally encourage pedestrian activity. Additionally, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the Los Angeles State Historic Park can host large events with up to 25,000 people and smaller monthly events of 500 to 5,000 people, including concerts, movie screenings, and the farmer's market.

Comment P702-121 Future development

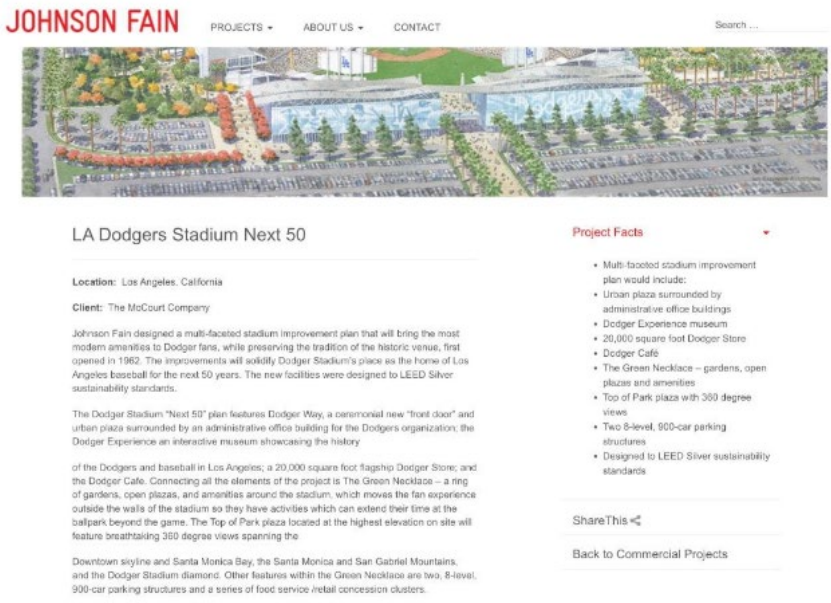
This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community. This is a foreseeable consequence of The Gondola, especially considering policies and laws that incentivize development near major transit stops. The Draft EIR fails to provide an analysis of the environmental impacts of development in Chavez Ravine. While The Applicant claims that there are no current plans for development, news articles that reported the terms of the sale of the Dodger Stadium parking lot do.

- "How Frank McCourt Made $2 Billion From The Los Angeles Dodgers And Team Remains Saddled With Debt."
- ""In addition to another sports facility, the potential property uses cited in the document include homes, offices, restaurants, shops, entertainment venues, medical and academic buildings, and a hotel and exhibit hall."

  https://www.latimes.com/sports/la-xpm-2012-may-04-la-sp-0505-dodgers-land-20120505-story.html

- "McCourt has the right to sell his 130 acres to Guggenheim for another $150 million, or can buy back part of the land in order to build a sports venue there."
- https://www.forbes.com/sites/mikeozanian/2013/06/15/how-frank-mccourt-made-2-billion-from-the-los-angeles-dodgers-and-team-remains-saddles-with-debt/?sh=40ac62921249
- Next50 Plan – Johnson Fain

  https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/



Screenshot of Johnson Fain Website – LA Dodgers Next 40

Response P702-121 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues– has been well established. Further, as discussed in Topical Response G, the "Next 50" project was proposed over 15 years ago and did not proceed after 2008. The current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR. Further, as discussed in Topical Response G, the purported "future" development that commenters suggest is contemplated at Dodger Stadium would require additional City designations and zoning, permits, and approvals, including potentially environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed. Moreover, mere statements from a website or actions from over a decade ago, and speculative comments attempting to assign a motive to such actions, do not evidence a firm and specific commitment to develop the property surrounding Dodger Stadium. The proposed Project is solely comprised

of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not omit foreseeable development from its analysis, and CEQA expressly discourages such speculation.

Comment P702-122 Prior to turning the land into the Dodger Stadium parking lots, there were plans to build public housing on that site. Public housing was the reason the residents of La Loma, Bishop, and Palo Verde were evicted from their land, which robbed them of their opportunity to build generational wealth. The descendants of this area should have a say as to what happens to this land should it no longer be needed for Dodger Stadium parking.

Response P702-122 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P702-123 The Draft EIR also fails to provide analysis of the environmental impacts of turning the Dodger Stadium parking lot into a park-and-ride lot for events at LA State Historic Park and for access to Metro's regional rail network at Union Station. The use of Dodger Stadium as a park-and-ride lot was discussed at Metro's November 16, 2022, Ad Hoc Olympics Committee meeting. This is yet another foreseeable use of The Gondola that would bring additional traffic congestion, greenhouse gas emissions, and pollution into our already overburdened neighborhoods.

Response P702-123 Refer to Response P702-3 for a discussion of Metro's November 16, 2022, Ad Hoc Olympics Committee meeting. Based upon a review of this meeting, no member of the Ad Hoc 2028 Olympics Committee discussed the potential for using Dodger Stadium as a parking location for the 2028 Olympics. Rather, this commenter raised the possibility themselves during public comment at the meeting. Accordingly, the mere speculation of a single commenter does not mean that Dodger Stadium could be considered as a proposed parking location for the 2028 Olympics such that the Draft EIR should have considered the use of Dodger Stadium as a park-and-ride. This is not a reasonably foreseeable consequence of the proposed Project, as the Los Angeles Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner is too speculative to require the analysis in the EIR for this aerial gondola system.

Comment P702-124 This project will likely result in the loss of the 100+ housing units that were planned for the 1201 N Broadway site, where the Broadway Junction would be located. The DEIR shows a rendering of a possible housing development incorporated into the Broadway Junction, but building housing at a station, especially one that

includes the drive motor, involves vibration and noise isolation and additional engineering, which means additional cost. Given that no funding plan has been presented for this project, we are skeptical that LA ART would be able to build a project that incorporates housing into that site.

Response P702-124 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential uses,. As discussed in Section 2.0, Project Description, of the Draft EIR, 1201 North Broadway is location of the proposed Project's Broadway Junction, a non-passenger junction. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for an analysis of the proposed Project's cumulative and potential growth inducing impacts. Pursuant to Section 15130(b)(1)(A) of the CEQA Guidelines, a list of past, present, and probable future projects producing related or cumulative impacts was used as the basis for the Draft EIR's cumulative impacts analysis. As shown on Table 5-1, Related Projects, a mixed-use redevelopment project at 1201 North Broadway, i.e., the location cited in the comments as a potential development site, was analyzed as a related project for the Draft EIR's cumulative impacts analysis. All approved and proposed related projects relevant to the cumulative analysis for the proposed Project were included in Table 5-1. Accordingly, the proposed Project considered the potential for this related project and considered integration of design to enable the proposed housing project to move forward. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P702-125 SB44

This is not a public transportation project. It is a private transportation project that serves a private property. In addition, Dodger Stadium is not an Olympics venue. For these two reasons, we do not believe that this project qualifies for SB44, and we object to the use of this law as yet another means to fast-track this project.

Response P702-125 Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. The proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment P702-126 Preferred Alternative – Enhanced Dodger Stadium Express (DSE)

On page 14 of Appendix N – Transportation, "While the DSE has travel time benefits associated with the bus lanes on Sunset Boulevard, it experiences congestion at gate entrances to Dodger Stadium because there are no dedicated lanes at the entrances, and the DSE and transportation network companies (TNC) like Uber and Lyft use the same parking booth as the DSE". These problems must be resolved. There should be dedicated bus lanes at the entrances and DSE should not share a booth with Uber and Lyft. We hope that the managers of the parking lot can make these improvements.

Response P702-126 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P702-127 Replacing the DSE with electric buses will also make this zero emissions transit.

We also suggest expanding the DSE service with additional satellite locations where people can access the service, similar to how the LAX Flyaway shuttle can be taken from several locations. This would eliminate transfers for many people. Metro knows how important it is to eliminate transfers. Metro spend billions on the regional connector to provide people with a "1-seat ride." The DEIR only considers stationing buses at Union Station, which means that transfers are almost always a part of accessing Dodger Stadium via The Gondola.

Response P702-127 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded

Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P702-128 Additional Comments

It is stated repeatedly in the DEIR that gondola systems are proven technology and operating successfully around the world as urban rapid transit. The use of aerial cable cars for urban transit still has many open questions and gaps in research according to a scientific literature review by Flesser and Friedrich published in October 2022 entitled, "Are We Taking Off? A Critical Review of Urban Aerial Cable Cars as an Integrated Part of Sustainable Transport."

(https://www.mdpi.com/2071-1050/14/20/13560). Proponents of the LA ART Gondola often point to the transformative effects of the gondolas in Medellin, Columbia. The changes in Medellin, however, were also supported by complementary investments that were six times the cost of the Metrocable gondola. "In contrast to previous studies focusing mainly on cable car costs themselves, a study revealed that the complementary costs for urban improvement projects in Medellin were approximately six times the costs of the cable car itself, not considering the additional expenses for local social programs."

Response P702-128 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits

to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. As discussed therein, an aerial transit system ("Metrocable") operates throughout a network that connects the innermost areas of Medellín to communities lying in the hillsides of the Aburrá Valley. Metrocable comprises an integral part of Medellín Metro, the city's public transportation system, serving residents who commute to and from Medellín's city center. Since its initial opening in 2004, Metrocable has reduced travel times throughout the city dramatically, from as much as two hours by car to 30 minutes by aerial transit. Moreover, by making transportation more accessible to outlying, disadvantaged communities, Metrocable has been found to enable greater job access, which in turn has led to higher incomes for residents with access to the Metrocable system. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of additional studies analyzing aerial transit systems around the world, including their effects on local businesses, crime reduction, and social mobility.

Comment P702-129 We disagree with the conclusion in Appendix H – Energy Technical Report. We contend that The Project would result in a significant impact due to unnecessary consumption of energy resources because this entire project is unnecessary. (See Preferred Alternative – Enhanced Dodger Stadium Express (DSE).)

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR for discussion of how the proposed Project would have a less than significant impact on energy resources. Refer to Topical Response A, SB 44, for discussion of how the proposed

Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P702-130 Conclusion

This project is not for our communities. This project is for Frank McCourt who is a developer, it's for the Olympics, which is for developers, and it's for the politicians who are in the pockets of developers. Frank McCourt wants to build 40 ft over our neighborhood.

There have been so many lies about this project from LA ART, withholding information, and misleading statements. But we know what this project is really about. Frank McCourt has long wanted to build a retail and entertainment complex at the Dodger Stadium parking lot. A permanent transit stop would provide incentives to build bigger there. This gondola is to serve those ambitions and not the residents and businesses of the surrounding communities.

Response P702-130 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for

a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P702-131 This project makes no sense for serving events and games at Dodger Stadium. At maximum capacity, it can only handle a fraction of the attendance at Dodger Stadium. Most people will not want to take public transit home late at night and will drive to the gondola instead. Maybe some will take transit, but these are probably the same people who would have taken the Dodger Stadium Express, which we support.

Response P702-131 Refer to Response P702-29 for an overview of the need for the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment P702-132 The preferred alternative, enhancement of the Dodger Stadium Express bus service can be improved and expanded further than was explored in the DEIR. The bus service also does not have any of the negative impacts associated with The Gondola, including unavoidable construction noise and vibration, destruction of the entrance of LA State Historic Park, operating noise in our neighborhoods, invasion of privacy, safety and security risks, shifting of traffic and parking burdens from Dodger Stadium into Chinatown, and transfer of public property to a private entity. Rather than force this urban cable car experiment on our communities, an experiment we never asked for, there should be a comprehensive study to improve access to Dodger Stadium, a study that includes not only the expansion and electrification of the

Dodger Stadium Express bus service, but also more bike lanes, better sidewalks, and an escalator up the hill for pedestrians. Clearly, the Dodger Stadium Express needs to continue to be available in order to serve as a backup to The Gondola, so let's build upon what we already have, our existing infrastructure (the many wide roads into Dodger Stadium), and make it much better.

Response P702-132 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P702-1 through P702-131. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with the Dodger Stadium Express. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of the Pedestrian Enhancement Alternative, which was considered but dismissed from further consideration. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P702-133 This project is a shame. If you're standing up and supporting this, you're teaming up with Frank McCourt who bankrupted the Dodgers. You're teaming up with those who erased the original Chinatown to build Union Station. You're teaming up with those who evicted the residents of La Loma, Bishop and Palo Verde for public housing, and then gave the land over to build Dodger Stadium. You're choosing that side of history.

Response P702-133 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P702-134 We respectfully ask that LA ART and Metro respond to all of our comments throughout this letter, not simply the specific impacts listed. We ask this project be

placed on hold until a feasibility study is published and a funding plan is released. Certainly, if the project is well-defined enough to be in the environmental review, there is no reason that these two documents cannot be made public, even in draft form. A new DEIR should be released that addresses the omissions and shortcomings identified in the comment letters.

Response P702-134 All comments within the letter have been responded to in this Final EIR. In addition, the Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P702-135 Our communities should not be sacrificed for an aerial transit experience. Rather than create "a cultural landmark that enhances the visibility of Chinatown" as LA ART's supporters contend, The Gondola would serve as a monument to the modern-day exploitation & marginalization of our communities by a billionaire developer & our elected leaders. The LA ART Gondola would be an embarrassment and an iconic symbol of injustice.

The solution is for Metro and for our elected leaders to deny approval of this project. Work with our communities on common sense solutions to improve traffic and provide other options to get to Dodger Stadium. Please STOP THE GONDOLA.

Sincerely,

Phyllis Ling
Tany Ling

Amy Ho
Peter Ho
Edwin Li
Susan Jung
Ron Frank
Meika Best
Angela Cai
Mei Yan Cai
Xue Nie Yuen
Myra Welsh
Albert Ho

Response P702-135 This comment provides a general conclusion regarding comments raised in this letter. Responses to the comments contained in this letter are provided in Responses P702-1 through P702-134.

Comment Letter P703 – Yuval Bar-Zemer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P703

Comment P703-1 Dear Mr. Zelmar:

This letter is submitted by myself, a citizen of the City of Los Angeles who lives and work in proximity to the proposed Los Angeles Aerial Rapid Transit Project (the "Project") in response to the release of the Project's Draft Environmental Impact Report ("Draft EIR" or "DEIR").

Response P703-1 This comment provides a general introduction regarding the comments raised in this letter. Responses contained in this letter are provided below in Responses P703-2 through P703-14.

Comment P703-2 I. GENERAL COMMENTS

A. Metro fails to analyze the impact of a private company operating a transit system in the public realm.

a. After reviewing the entire report, I have not seen a single document detailing ANY hours of operation let alone detailed and specific hour per day, or days of operations per year! Many of the reports would vary drastically if the Aerial Tram operated only during game days, and only for 6 hours during a game day versus being operational 14 hours per day.

Response P703-2 The Draft EIR discussed hours of operation in Section 2.0, Project Description, of the Draft EIR. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, the proposed Project is anticipated to provide daily service between 6:00 a.m. and 12:00 a.m., subject to operational changes in response to ridership demand. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project operations were analyzed in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, and as summarized in the Executive Summary of the Draft EIR, impacts related to operations of the proposed Project would be less than significant.

Comment P703-3

b. Following the above lack of clarity or commitment by a private company (LAART) fails to identify the business model that would dictate the hours of operation and the cost to the public. This is necessary to determine the feasibility for the operator, and assuming the LAART provides a contractual commitment to a schedule and a cost per passenger, many of the reports may need to be revised! Here are just a few examples:

Response P703-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would be free to ride for anyone with a ticket to a Dodger game.

Comment P703-4

i. The calculation of the energy use would change dramatically (486 hours of operations annually, if it services game days only vs 4,380 hours of operations annually if it is a public service).

Response P703-4 Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Project's potential energy-related impacts, concluding that the proposed Project would not result in a significant impact. Refer to Response P703-8 for further discussion of the energy related- impacts of the proposed Project and ridership. The proposed Project has evaluated and developed a reasonable basis for anticipated ridership that accounts for energy consumption during periods of varying usage intensities, such as during game days and non-game days. The energy consumption assumed in the Draft EIR's analysis of energy consumption was based on the anticipated usage of the system and assumes the highest anticipated ridership, though energy demand for the proposed Project would vary in relation to ridership volumes. The proposed Project is anticipated to have less than significant impacts related to energy based on the highest anticipated usage. The Draft EIR evaluated the proposed Project's energy related- impacts against the relevant significance thresholds from Appendix G of the CEQA Guidelines and found those impacts to be less than significant, concluding that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Comment P703-5

ii. The reduction in vehicle trips is directly related to the hours of operation and the cost of the ride. Since none of this data is provided in a form that

can be analyzed, how can we make any assumptions on attendee's behavior.

Response P703-5 Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. The VMT analysis was conducted for both daily (daily weekday and daily weekend) and annually, as shown in Tables 3.17-4 and 3.17-5 of the Draft EIR, respectively. The annual VMT represents the VMT reduction benefit across a whole year, associated with Dodger Game Days. As described in pages 3.17-34 through 3.17-36 of the Draft EIR, the tourism ridership, the Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not quantified in the annual VMT reduction calculation in order to ensure a conservative analysis. Additionally, the model inputs and assumptions that were used to estimate ridership for games and events at Dodger Stadium were conservative as well. Including the additional market segments that were not included in the quantitative VMT analysis, users in the annual VMT analysis would have resulted in a greater VMT reduction than reported in the Draft EIR. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would be free to ride for anyone with a ticket to a Dodger game.

Comment P703-6

iii. The length of hours of service during game days are assumed to be 2-3 hours before the game, and 2-3 hours after the game. In a perfect world and according to the capacity of the system, it could deliver 15,000 people to the stadium before the game and 15,000 back to Union Station. This assumption is flawed as there was no study conducted to determine a person's willingness to wait more than an hour to start their trip home. The project fails to analyze its and Metro's capacity to actually deliver 15,000 passengers to their desired destination withing the 3-hour window. Without such study the assumption of the number of passengers using this new mode of transportation is an uneducated guess and therefore cannot support any assumptions on the reduction of Vehicle mile traveled (VMT).

Response P703-6 Refer to Response P703-2 for discussion of the anticipated operating hours analysis of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). While the capacity of the system over three hours could be 15,000 pphpd, as detailed on page 3.17-35 of the Draft EIR, the ridership associated with game/event attendees is forecast to be 6,000 riders in 2026 and 10,000 riders in 2042, not the 15,000 passengers referred to by the commenter.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership

model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service.

Comment P703-7

iv. The impact on a public that is enjoying the park at all hours of the day, would be very different on game days versus every day.

Response P703-7 As discussed in Section 3.17, Transportation, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the majority of the riders using the Chinatown/State Park Station on game days would be transferring from the Metro L Line (Gold) Station. These riders would walk along Spring Street to the Chinatown/State Park Station at the southernmost portion of the Los Angeles State Historic Park. Therefore, these riders would not affect park users. Moreover, the proposed Project would provide an additional transit option to riders visiting the Los Angeles State Historic Park, including for events at the park. Further, as discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P703-8

v. The efficiency of operating the Gondola will vary dramatically if it operates every day. Even if the use a is minimal, the average use of KW per passenger will grow dramatically amounting to a massive waste of energy.

Response P703-8 Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for an evaluation of energy-related impacts of the proposed Project. The proposed Project has evaluated and developed a reasonable basis for anticipated ridership that accounts for energy consumption during periods of varying usage intensities, such as during game days and non-game days. The energy consumption used in Appendix H was based on the highest anticipated ridership, though energy demand for the proposed Project would vary in relation to ridership volumes. The proposed Project is anticipated to have less than significant impacts related to energy based on this basis of ridership. Additionally, in Section 3.06, Energy, determined that the proposed Project would not result in wasteful use of energy.

Comment P703-9

c. What is the impact of this project when a private company goes out of business? Who will pay to remove the "scar" that was created in the skies of Angelenos. How would we calculate the many environmental impacts? If the Aerial Tram operating company goes of business, would government step in to run an inefficient, money losing model just to maybe get dodger fans to a game?

Response P703-9 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P703-10

d. The reduction in GHG is based on a number of assumptions: That in the future the electricity would be generated from 100% renewable sources. It also looks to a horizon of 2042. I am assuming the study is based on the mandatory requirement that a utility company be 100% renewable by that date or before. However, the State of California's mandate that all vehicles stop producing GHG by 2035, so even if this project is not implemented, the GHG reduction will be reached within a similar time frame. That change in private vehicles has not been made a factor in the calculation of GHG reduction.

Response P703-10 Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of how power requirements for the proposed Project would be supplied through LADWP's Green Power Program, which is derived from renewable resources. The use of 100% renewable power from the Green Power Program is a voluntary commitment by the proposed Project to further demonstrate the proposed Project's leadership towards sustainable transportation. This commitment is accurately captured in the proposed Project's GHG analysis provided in Section 3.08, Greenhouse Gas Emissions, of the Draft EIR. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, in this Final EIR. The mobile source emissions in the Draft EIR were estimated using the latest version of the California Air Resources Board's mobile source emission factor model (EMFAC2021). EMFAC2021 was designed to account for the effects of all reasonably foreseeable and quantifiable federal and state regulations related to on-road mobile sources. Thus, the analysis accounts for what the state believes is a reasonable anticipation of what the vehicle fleet looks like in the future. Executive Order N-79-20 mandates that new vehicles sold in California be zero-emission by 2035. This comment does not accurately represent the regulation because the Executive Order does not mandate that all vehicles in California stop producing emissions. Additionally, the mobile source emissions in the Draft EIR demonstrate consistency with CARB's 2022 Scoping Plan Update addressed on page 3.8-5 of the Draft EIR. The update to the Scoping Plan accounts for the electrification of California's mobile vehicle fleet mandated under Executive Order N-79-20 and widespread adoption of zero-emission vehicles (ZEVs). These measures under the updated Scoping Plan are aimed at reducing GHG emissions from on-road vehicles. By supporting VMT reduction through offering an innovative, alternative mode of transportation, the proposed Project advances state-wide policies aimed at reducing on-road mobile GHG emissions. Further, as an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies. Refer to Section 3.08, Greenhouse Gas Emissions, and

Tables C-1 through C-4 in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, for additional discussion.

Comment P703-11

e. The bus service that offers a shuttle from union station to Dodger Stadium, is very popular and can be easily scaled without massive infrastructure spending or its associated impacts. Why is this not an alternative that was studied in detail. (It would qualify as the "No project" alternative as the components are already in place. (Appendix N refers to the Dodger Express as a static number that can not change and ignores in its time calculation the first mile driven (in other words, it gives the example as if the trip starts at the gold line station in south Pasadena and not in the persons home or office)

Response P703-11 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management ("TSM") Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. CEQA requires the No Project Alternative to determine the consequences of not implementing the proposed Project. The TSM Alternative does not qualify as a No Project Alternative as it would require considerable increases to bus frequency and passenger loading capacity, which would necessitate additional buses and high-capacity loading facilities. Appendix N, Transportation Appendices, of the Draft EIR, includes a detailed memorandum summarizing the data and methodology for developing ridership estimates. Data from the Dodger Stadium Express was used to develop and calibrate the ridership model. The comment states that Appendix N "refers to the Dodger Stadium Express as a static number that cannot change and ignores in its time calculation the first mile driven." This is not accurate and may be a misinterpretation of how the Dodger Stadium Express travel time of 25 minutes, including transfer time shown on page 5 of Appendix N, was used. The 25 minutes is only for the Dodger Stadium Express portion of a trip. For Dodger Stadium Express riders who arrive at LAUS via automobile, the travel time between the zip code of origin and Union Station was calculated using the GIS ESRI's "Routable Network," as described on page 4 of Appendix N, and was added to the Dodger Stadium Express travel time. For Dodger Stadium Express riders who arrive at LAUS via transit, also as described on page 4, the travel time between the zip code of origin and LAUS was calculated using Metro and Metrolink timetables plus transfer penalties if the transit trip requires a transfer, wait time(s) for train(s), and travel time to the transit station origin, all of which was added to the Dodger Stadium Express travel time. Thus, first mile driven was included in the estimates. As noted on page 9 of Appendix N, Model

Documentation memorandum, the ridership model was calibrated to replicate existing conditions of the Dodger Stadium Express.

Comment P703-12

f. The project proponents are portraying this public transportation system as something "normal' that has been implemented in many places around the globe however, the project fails to provide detailed comparisons to other the projects, explaining the inefficiency of the proposed model.

Response P703-12 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. Refer also to Table 2-1: ART Precedents, in Section 2.0, Project Description, in the Draft EIR, which depicts other ART systems in place in various cities around the world. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Finally, as discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P703-13

g. The study alludes to the positive effect of such a project as a way to educate the public on a new type of "innovative" public transportation. However, the study fails to analyze the impact on the public; where the public space on grade has been dominated by transportation, the space below grade is taken for transportation and is now the last bit of "free" space left for the public to engage with nature We are being compromised by an "innovation" that may be attractive to a few for their own selfish devices. What a nightmare!

Response P703-13 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems,

3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P703-14

h. The DEIR has concluded that there are no significant view impacts as a result of the aerial tram. I have attached few screen shots of a 3D model that represents the Aerial tram, and the China town station as seen from the park. For a park that is designed to have open skies, such conclusion appears to be absurd. The fact that the study did not provide a 3D digital tool for the public to be its own judge on the view impact may explain why the proponent selectively picked a few convenient spots to render (out of a 3 D model that clearly was not make available for public viewing.

Yuval Bar-Zemer

Response P703-14 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As outlined in Section 3.01, Aesthetics, of the Draft EIR, the methodology utilized to examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). Further, views and potential impacts were analyzed using thresholds of significance identified by the CEQA Guidelines and the L.A. CEQA Thresholds Guide. As a part of the analysis, a series of visual simulations were conducted from/within Landscape Units (LU) and Key Observation Points (KOPs) that were delineated and identified based on known significant views and locations with proposed changes to the setting. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, for discussion of the methodology used to prepare the KOPs for the Draft EIR. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional simulations of the park to further analyze viewshed impacts to the Park. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared. As discussed therein, a 3D digital model of the proposed Project's surrounding urban context was prepared using ArcGIS software with source data from the United States Geological Survey (USGS) Digital Elevation Model for the topography, and from Los Angeles Region Imagery Acquisition Consortium (LARIAC) for the building locations, footprints, and height extrusions. This context model allowed the preparer of the KOPs, RIOS, to accurately place the proposed Project 3D digital model into context without distortion. RIOS then rendered the proposed Project 3D digital model in perspective

to match the KOP vantage point, and place the rendered component into the existing photo via photoshop. This process allows the KOPs to realistically illustrate what the proposed Project will look like in the surrounding context. The "screen shots" of the "3D model" referenced in this comment do not appear to have followed a similar methodological approach, and accordingly do not realistically illustrate what the proposed Project will look like in the surrounding context as compared to the KOPs used to form the basis for the analysis in the Draft EIR. The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. CEQA does not require that the Draft EIR include a 3D digital model for interactive use by the public.

Comment Letter P704 – Don Luis Camacho

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P704

Comment P704-1 Dear Mr. Zelmer

I am writing in support of the LA ART project ? it is an innovative new mode of transportation that will help us meet our climate goals. My Company, Camacho?s Incorporated, has been headquartered at El Pueblo de Los Angeles Historical Monument since 1984 when my father, Andy Camacho, purchased El Paseo Inn Restaurant on Olvera Street. My family and I continue to own and operate that restaurant. We have so much pride for the history and culture that exists on Olvera Street, but each year it continues to be more and more challenging to attract new customers. In addition, the last few years have been extra challenging due to COVID-19. I believe that LA ART would help bring new life to Olvera Street, attracting new patrons and create a destination for El Pueblo. I will continue to advocate for the project and look forward to working with the project proponents and Metro to ensure we have community benefits that will help me and all the merchants along Olvera Street.

Response P704-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Additionally, the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response C, Project Features,

discussing the proposed Project's potential partnerships with and benefits to local businesses. The proposed Project could partner, for example, with El Paseo Inn Restaurant and the Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. For instance, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the location of the proposed Project's Alameda Station optimizes pedestrian access. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street.

Comment P704-2 Given my interest to the project, I have reviewed the DEIR, and have a few questions I look forward to the project team answering.

Response P704-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Responses to the comments contained in this letter are provided in Responses P704-1 and P704-3.

Comment P704-3 Given the proposed proximity of construction to my family's restaurant and the other Olvera Street merchants, what steps would the project take to make sure that businesses are not negatively impacted during construction? How will road and sidewalk closures be handled? Will access be maintained, or detours provided? I look forward to hearing about mitigation planning during a construction phase.

Thanks,

Don Luis Camacho
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Response P704-3 Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to pages 3.17-50 through 3.17-52 for discussion of how during construction of the proposed Project's Alameda Station, pedestrian access to Olvera Street businesses would be maintained throughout construction. Pursuant to Mitigation Measure TRA-B, the proposed Project will prepare a detailed Construction Traffic Management Plan (CTMP) including street closure information, detour plans, haul routes, and a staging plan, which shall be prepared and submitted to the City for review and approval prior to construction. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. Additionally, refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities.

Comment Letter P705 – Colleen Meyers

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P705

Comment P705-1 My name is Colleen and I live really close to where the gondola would be at the Llewellyn Apartments. I board at College Station every day to get to work in West Hollywood. One of my favorite things to do is relax at the State Park after working 50hrs a week. The gondola would ruin that by putting enormous support towers in the sky where people go to enjoy nature and be healthy.

Response P705-1 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32- acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment P705-2 Is there any data on the noise this would emit? College Station is already so loud, you can hear it from the entrance of the park and it's not relaxing there at all. I feel like the gondola cars would just make that worse and ruin the are for everybody.

Response P705-2 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts

from the proposed Project, including in the Los Angeles State Historic Park, identified in the evaluation of noise impacts as Noise Sensitive Receptors (NSR) 14N and 14S. To provide a conservative operational noise analysis, the worst-case scenario was selected which represents a Dodger Game Day, with the highest line speed, cabins per hour, and queuing numbers, and with nighttime operations. Tables 3.13-22, 3.13-23, and 3.13-24 on pages 3.13-53 to 3.13- 57 of Section 3.13, Noise, of the Draft EIR demonstrate that operational noise impacts would be less than significant at all receptor locations including NSR-14N and NSR-14S, based on the L.A. CEQA Thresholds Guide, FTA, and Los Angeles Municipal Code. In addition to the primary operational noise levels evaluated in the Draft EIR, the noise generated inside cabins was also evaluated separately, as demonstrated on Table 3.13-25 on page 3.13-57 of the Draft EIR. The cabin noise would not result in a contribution to cumulative noise levels because NOI-PDF-A ensures that the cabins would be designed such that they would generate noise levels of at least 10 dBA below the current background levels. Table 3.13-26 summarizes operational noise impacts for the worst-case operational scenario which includes potential impacts from cabin noise as the gondolas travel between and within the stations, towers, and junction. Operational noise impacts would be less than significant.

Comment P705-3 I also learned the gondola cars would be used for advertising and electronic billboards. This is horrible and we should not allow that into our airspace. Don't we have airspace rights here? This is so useless because giant ads like billboards, people already don't care about that. Why would anyone care about the ads you put on the gondola cars? You would just rake in money and make eyesores for everybody that lives here.

Response P705-3 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's proposed signage including on the gondola cabins. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. As discussed in Topical Response C, Project Features, the proposed Project's cabins could feature artwork from local artists or other community programming.

Comment P705-4 In addition, College Station is already not the cleanest. You should invest in keeping your existing stations clean before you take on these projects that would just make them dirtier. And we all know how the Metro takes what? A decade? To clean up the actual bus seats. This gondola might be shiny and new to start, but it will just become disgusting germ vestibules over time. I don't trust you guys to keep anything sanitary honestly. And how are you going to prevent Covid in these cabins where the windows don't open? You're building superspreader boxes.

Please reevaluate yourselves.

Response P705-4 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator.

The overall system would be observed on a daily basis as part of the startup routine. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. Additionally, as discussed in Section 2.0, Project Description, of the Draft EIR, cabins would feature a ventilation system.

Comment Letter P706 – Tany Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P706

Comment P706-1 I am a resident and homeowner in Chinatown and I live along the proposed route of the gondola. I am OPPOSED to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium) and here's why:

Response P706-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P706-2 1- This is not a real public transit project: The route is incredibly short (just over 1 mile), basically only serves the stadium, and it replicates a route that is already served by existing public transit (Dodger Stadium Express buses, metro Gold Line light rail, existing metro bus routes). The limited service that this route offers is not worth the cost of the project in financial terms or in terms of destruction to the community and public spaces.

Response P706-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the

Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment P706-3 2- There was no community input at the outset: This project was hatched privately without any outreach to the very people who will be impacted by it; only when it entered the EIR period was it unveiled to the public and essentially paraded as something that we should want/need, even though we never asked for it.

Response P706-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping

period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the proposed Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided to both at the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response N, Environmental Justice, for further discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment.

Comment P706-4 3- Destruction of privacy to residents: These gondola cabins will fly so low to the ground and over private homes that all sense of safety and privacy will be eliminated for residents.

Response P706-4 As discussed on page 2-18, in Section 2.0, Project Description, of the Draft EIR, industry standards for the design and operation of ropeways and cabins are documented in the American National Standards Institute (ANSI) Standard B77.1, which is developed in coordination with manufacturers, consumers, and regulators. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. Subject to these ANSI B77.1 requirements, vehicles, vegetation or terrain, pedestrians, buildings, and roadways or railways are permitted below the ropeway and cabins. The proposed Project would meet and anticipates exceeding the ANSI B77.1 requirements for clearances. Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of

environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Comment P706-5 4- Visual and auditory blight: Gondola cabins flying over the park, over the streets, over the homes and apartments, over the pedestrians, etc.; Hulking Broadway Junction towering over Broadway/Bishops Road, noise from the machinery at Broadway Junction and whatever noise is created by the gondolas themselves. The towers, new stations, Broadway Junction will all be large and permanent structures which will destroy what's left of the open space of Chinatown and the LASHP. All this for the sake of, not public transportation, but a billionaire's long-scheme to develop his parking lots at the expense of taxpayers?

Response P706-5 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. Operational noise impacts would be less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has

applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment P706-6 We, the residents and stakeholders directly impacted by this proposed project, have stated many times over that we DO NOT WANT the gondolas. You have been given proof that it will not help with air pollution or taking cars off the roads. Chinatown is not for sale. There are better and cheaper ways to address the actual transportation issues with Dodger Stadium - ways that do not destroy the LASHP or the surrounding residential neighborhoods:

1- Electrify the bus fleet for Dodger Stadium Express

2- Increase the number of Dodger Stadium Express buses

3- Have pick-up/drop-off points in other parts of town such as Los Feliz, Atwater, Silverlake for the Dodger Stadium Express

4- Get serious about having bus-only lanes on game days so that these buses get priority over automobile traffic.

5- Improve pedestrian access to the stadium so that it provides wide and safe passage

Response P706-6 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding

communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. The proposed Project would not preclude any of the improvements noted by the commenter.

Comment P706-7 If this project gets approval over all of the public outcry, this will be the greatest social injustice since Chavez Ravine was destroyed in order to build the Stadium. Is this the legacy you want for Metro?

Stop this project, do not approve, do not pass Go.

Response P706-7 Refer to Response P706-3 for discussion of the proposed Project's public outreach and stakeholder engagement process, which led directly to changes to the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P707 - King Cheung

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P707

Comment P707-1 (1). Chinatown does not need a gondola. Chinatown needs a hospital and supermarket

Response P707-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P707-2 (2). The gondola will not improve traffic. Most people will drive to Chinatown to ride the gondola. Do not turn Chinatown into Dodger Stadium's parking lot.

Response P707-2 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take

transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P707-3 (3). The gondola stations will be noisy all day until late at night. This is unhealthy.

Response P707-3 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment P707-4 (4). Taxpayer dollars should not be used for any part of this project.

Response P707-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P707-5 (5). The gondola towers and stations are too big and not attractive. They do not look like Chinatown. They do not look Asian.

Response P707-5 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers and stations, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P707-6 (6). The tower leaning towards Metro Lofts looks like it will fall on the building. This is bad Feng Shui. This is a culturally insensitive project.

Response P707-6 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to

Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Response P707-5 for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant.

Comment P707-7 (7). There will be no more available street parking. The gondola will make it harder for small mom-and-pop businesses to survive. Where will their customers park? (8). The Gondola does not help the small businesses in Chinatown.

Response P707-7 Refer to Response P707-2 for discussion of how while parking is not required to be analyzed under CEQA or the TAG, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment P707-8 (9). The gondola will distract drivers and make our streets more dangerous.

Response P707-8 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of American National Standards Institute (ANSI) Standard B77.1 Industry standards for the design and operation of ropeways and cabins are documented in ANSI B77.1, which regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles and pedestrians. ANSI B77.1 requires the following vertical clearances between the cabins and on-ground features: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project would meet and anticipates exceeding the ANSI B77.1 – 2017 and ANSI B77.1 – 2022 requirements for clearances. Given these required clearances and the height at which the cabins would travel over roadways, drivers would see cabins in the middle ground similar to where they might see a pedestrian overcrossing. Accordingly, cabins would create no more of a distraction to drivers than pedestrian overcrossings. Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of how proposed Project components would have less than significant to no impacts on visibility of cars, pedestrians, and bicyclists. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable

aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P707-9 (10). This gondola project will damage our big park (LASHP).

Stop the Gondola!

Response P707-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, as discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment Letter P708 - Land Protection Partners

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P708

Comment P708-1 Dear Mr. Zelmer:

The Los Angeles County Metropolitan Transportation Authority ("Metro") has accepted an unsolicited project to build a private conveyance between Union Station and Dodger Stadium known as the Los Angeles Aerial Rapid Transit Project (the "Project"), has assumed Lead Agency status under dubious authority in that it is not the agency that has the principal responsibility for approving or carrying out the project, and has issued a Draft Environmental Impact Report ("DEIR").

The conclusions in an EIR must be based on substantial evidence, which is discussed in the California Environmental Quality Act as follows (Pub. Res. Code § 21080, subd. (c)):

> Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

In the comments that follow we focus on the impacts to biological resources and identify that most of the conclusions and assertions in the DEIR are not supported by substantial evidence, and in fact substantial evidence supports the opposite conclusion from those assertions. As experts in environmental impact analysis of biological resources with decades of experience (see biographies below), we provide these comments as facts, reasonable assumptions predicated on facts, and expert opinion supported by facts.

Response P708-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments in this letter are provided in Responses P708-2 through P708-19. This comment provides a general recitation and characterization of the CEQA statute. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for expert analysis supported by facts and relevant information and reasonable inferences from this information to support the EIR's conclusion that the proposed Project would result in less than significant

impacts to biological resources with mitigation. As discussed in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, Section 3.04 and the respective reports were prepared by experts in the field.

Comment P708-2 1 Inadequate Biological Surveys

Biological surveys for the Project are described in Appendix E of the DEIR. The consultants purport to have surveyed the entire alignment on a single day (April 1, 2020), including a 500-foot survey buffer around the route. The methods do not describe how the biologist surveyed the entire three-dimensional project area, which extends up to 200 feet upward from the alignment. This third dimension is often ignored by biologists and its study requires appreciation of the speed at which animals move when aloft (Kunz et al. 2008). A 500-foot survey buffer is inadequate for assessing species that are moving through the air at a rate of 30 miles per hour (the speed of a typical songbird), thereby traversing the entire study area in less than 23 seconds. Furthermore, a single daytime survey in April cannot describe the volume and diversity of migratory birds that traverse the project location at night (most bird species migrate at night) during spring and fall migrations. In short, the survey effort on which the project biological assessment was made is inadequate to be considered substantial evidence regarding any impacts to wildlife and especially to birds that traverse the three-dimensional volume that would be impacted by the proposed project.

Response P708-2 Refer to Section 3.04 Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on page 3.4-13, the 500-foot buffer was determined to be suitable for biological surveys as it is anticipated that indirect impacts beyond 500 feet in the existing environment would be diffuse and insignificant. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow-up survey focused on tree species occurring on April 24, 2021. As discussed in Section 3.04, Biological Resources, of the Draft EIR, during the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity, and potential bird nest sites were conducted using binoculars.

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for further discussion of the survey efforts in the BSA and the appropriate size of the BSA. As discussed in Appendix G, although the Draft EIR lists the wildlife species detected during the surveys, and states that these are common species, it does not conclude that the observed species are the only ones assumed to use the BSA, nor that sensitive species never occur in the BSA. Although additional surveys could increase the number of species detected, even exhaustive surveys may not result in detections of sensitive species that occur on site only occasionally. Nonetheless, a third field survey was performed March 23, 2023, to provide an updated habitat assessment for sensitive species and supplementary wildlife survey

effort. During this visit, two biologists surveyed the BSA over a 4.5-hour period (11:00 AM to 3:30 PM), including the bird species flying in the airspace above the BSA, and observed 17 bird species and 2 mammal species. The BSA encompasses a 500-foot buffer around the proposed Project alignment. Habitats and wildlife occurring outside of this 500-foot buffer were considered to be a sufficient distance away to not be affected by construction or operation of the proposed Project. Further, as discussed on page 3 of Appendix G, Supplemental Biological Resources Report, of this Final EIR, the use of radar studies and nocturnal surveys is unwarranted due to the lack of concentrated migration in the vicinity of the proposed Project alignment and because the height of the proposed Project is lower than the flight heights of nocturnal migrants. Refer to Section 3.1.2, Nocturnal Avian and Bat Collision Risk, of Appendix G, for further discussion of how the proposed Project would not pose a collision risk to birds flying at night, including nocturnal migrants.

Comment P708-3 Published guidelines to reduce impacts of power lines identify many techniques to evaluate the bird use of areas in route planning (APLIC 2006). These include: daytime and nighttime visual observation using tools to measure distance and altitude of birds (clinometers and theodolites), closed circuit television recordings, night vision tools such as image intensifiers, forward-looking infrared devices, and radar. Radar techniques are well established and were developed in 1978 to detect birds specifically to evaluate the risk of new transmission lines (Korschgen et al. 1984). These tools can be used to develop a reasonable assessment of the quantity and general species composition of birds that might be at risk of collision. Examples of such efforts are available in the published literature. Williams et al. (2001) used radar, visual observations, and a ceilometer to describe birds migrating through a mountain pass. Mabee and colleagues have described bird numbers and altitude of flight using radar at proposed wind power sites (Mabee and Cooper 2004, Mabee et al. 2006). Others have used nocturnal flight calls to identify passing migrants (Farnsworth et al. 2004, Farnsworth and Russell 2007). Nocturnal flight calls have been used by community scientists in Los Feliz to document nocturnal migrants passing over the downtown Los Angeles area (see https://www.youtube.com/watch?v=B1RyBDnCqcg&t=1s).

Response P708-3 Refer to Section 3.04 Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR for an analysis of the proposed Project's potential impacts to biological resources. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow up survey focused on tree species occurring on April 24, 2021. During the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity and potential bird nest sites were conducted using binoculars.

As discussed in Section 3.04 and Appendix E of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of

additional survey efforts and how the risk of avian collisions with the cables or components of the proposed Project would be less than significant. Design features of the proposed Project are likely to present a lower risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines. This comment also suggests that specialized survey techniques, including radar studies and nocturnal surveys be included to evaluate the species of nocturnal bird migrants passing over the BSA, as well as their flight heights. As discussed in Appendix G, these types of specialized surveys would be warranted if evidence indicated 1) migration were expected to be concentrated in the vicinity of the proposed Project alignment; and 2) potentially significant impacts were anticipated. However, neither of these is expected in this case and accordingly, the use of more specialized survey techniques is unwarranted.

Comment P708-4 2 Collision Risk

The DEIR acknowledges that installing large cables up to 195 feet in the air could pose a collision risk. The preparers' subsequent analysis of that risk, however, is replete with unsupported assertions and mischaracterizations of the literature.

The analysis of collision risk in the DEIR consists of the following statements in the main text and Biological Resources report (Appendix E):

- Ropeway cables would pose less danger than transmission lines because they are 1.75 to 2.5 inches in diameter compared with 1–2 inches for transmission lines and 0.5 inches for ground wires above transmission lines.

- The three ropeway cables would be spaced tightly in the vertical plane and so would pose less risk than if they were spread more broadly.
- The tight spacing of cables vertically would make them more visible.
- Cables would be made more visible by the moving cabins.
- Therefore avian collision risk from the cables would be less than for transmission lines.
- Concentrated avian activity is not expected near the project. Migratory movement is focused on prominent ridgelines, shorelines, and where favorable stopover habitat is located. The project is located "on a broad urbanized coastal plain, midway between the coast and the mountains, and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat."
- Grouse and ptarmigan have poor maneuverability in flight and collide with ski lift cables but no similar species are found in the project area.

Response P708-4 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. In addition, the proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet above ground level (agl), whereas the proposed Project component heights are all below 200 feet agl. Section 3.04, Biological Resources, of the Draft EIR—as further supported in Appendix G, Supplemental Biological Resources Report, of the Final EIR—states that migrant birds would pass over the alignment, and there is potential for birds to interact with ropeway cables when flying below 175 feet agl and towers when flying below 200 feet agl. As discussed in Appendix G, there is little evidence to suggest that the presence of natural features, such as the Los Angeles River or Silver Lake Reservoir, would result in concentrated migration, specifically in the proposed Project area. Direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment.

Comment P708-5 We consider these claims in turn.

Cable size. The DEIR relies on the idea that birds will be able to see the ropeway cables during the day because they can be half an inch larger than transmission wires. This is a preposterous claim. Notwithstanding citations in the DEIR, current published

sources indicate that there is no evidence to back this claim, which derives from experiments on transmission lines comparing the main power lines, which are always lower and larger, with the ground wires, which are always smaller and located higher than the main lines (Bernardino et al. 2018). Studies that remove the upper, smaller wires document a decrease in avian mortality but there is "no possibility of disentangling the effects of wire height and diameter" (Bernardino et al. 2018). There is some experimental evidence suggesting that it is the placement of the ground wire that is the important factor and that making it larger does not decrease collisions (Brown et al. 1987). The DEIR therefore errs in relying on the assumption that a tiny difference in cable diameter will mitigate daytime collisions. It also will not mitigate collisions at night, which is when most migratory birds will encounter the structure and cables. Nocturnal migrants do not see cables, even the guy lines that hold up 2,000-ft communication towers that are much larger than the proposed cables (Longcore et al. 2008), because they encounter them in the dark. There may be "general agreement" in the literature that larger cables are safer, but the most recent scientific review "found little scientific evidence that these recommendations [including to use larger diameter cables] are effective" (Bernardino et al. 2018).

Response P708-5 As discussed in Appendix G, Supplemental Biological Resources Report, of the Final EIR, the proposed Project's ropeway cables would be 1.75 to 2.5 inches in diameter, reducing the risk of collisions compared to transmission lines because they will be more visible to birds. Birds are capable of detecting objects from much further away than humans and can react to objects appearing in their visual field much more rapidly than humans, as must diurnal birds have a much higher concentration of rods and cones in their eyes than humans and their retinal structure allows for resolution of movement above 100 hertz. Furthermore, given the paucity of studies on gondola systems impacts to wildlife, using data on wildlife collisions with transmissions lines is a logical approach for comparison due to greater data availability. However, in the absence of studies that directly compare avian collision rates with transmission lines to their collision rates with ropeway cables associated with gondola systems, it would not be appropriate to assume gondola cables present the same diurnal collision risk. Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Refer to Section 3.1.2, Nocturnal Avian and Bat Collision Risk, of Appendix G, for further discussion of how the proposed Project would not pose a collision risk to birds flying at night, including nocturnal migrants. The proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. The proposed Project's components are located within an urban environment with many other obstacles of similar heights, and because avian flight during migration occurs at thousands of feet agl, the proposed Project components accordingly are not anticipated to contribute significantly to overall annual bird mortality.

Comment P708-6 Vertical spacing of cables. The DEIR argues that because the three cables would be packed tightly in the vertical plane, they would pose less of a risk than if they were

spaced out vertically. First of all, this claim has no evidence to support it in the published literature. Second, it imagines that all birds move in a single vertical plane through the atmosphere, as if they were aircraft on a flight path at a cruising altitude. That is not how birds move in space. Because birds increase and decrease in altitude as they use the airspace, the packing of the wires vertically is not the substantial mitigation measure that is assumed in the DEIR.

Response P708-6 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, there are limited empirical data available on avian collision with gondola cables, particularly in urban environments. A review of the literature since the publication of the Draft EIR provided no new information on this topic. However, as discussed in Appendix B to Appendix G, Memorandum from Doppelmayr Regarding Comparable System Bird Strikes, Doppelmayr USA, one of two manufacturers of 3S gondola systems in the world, noted that a similar 3S gondola project measuring about 0.5 mile long and spanning the Rhine River in an urban environment in Koblenz, Germany was recently approved for an extension of their operating permit after the first 3 years of operation, noting that no bird strikes were detected during that period.

Comment P708-7 Increased visibility of three cables. The DEIR argues that because there are three cables in close proximity, birds will see them more. Again, power lines often have several lines together and still result in avian collisions and mortality. There is no evidence to support this self-serving claim, and it similarly does not address nocturnal collision risk.

Response P708-7 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, most birds have far higher levels of visual acuity than humans, and can resolve movement much faster than humans. Most diurnal birds have a much higher concentration of rods and cones in their eyes than humans, and their retinal structure allows for resolution of movement above 100 hertz, compared to 60 hertz for humans. Birds are therefore capable of detecting objects from much farther away than humans and can react to objects appearing in their visual field much more rapidly than humans. In addition, most nocturnal avian flight occurs during migration, when birds usually fly thousands of feet above ground level, whereas the proposed Project component heights are all below 200 feet at ground level.

Comment P708-8 Risk relative to transmission lines. The DEIR presents its unsupported assertion that the cables would cause less mortality than a similarly situated power line as if it were evidence that is impacts would be less than significant. This is incorrect on two fronts. First, the DEIR provides no substantial evidence that the rate of avian collision and mortality would be less than power lines. The height of the cables and of power lines are similar. There is no support to claim that moving cars attached to the cables would

increase visibility (Bech et al. 2012) and especially moving cars would not be a factor in the middle of the night when the wires would be encountered by nocturnal migrants. Second, the question that must be answered for environmental analysis is not one of relative impacts, but whether the impact itself would be significant. Based on collision rates with power lines, any analysis of the impacts from the proposed project should start from the assumption that the 1.9 km length of the cables will kill up to 152 birds per year, and given the variability in collision rates, an average value would be 75 birds per year (Jenkins et al. 2010). This would be true of any aerial cable system at the heights proposed in the project area. The birds that could collide with it might include sensitive species (given their presence in the surrounding park and along the Los Angeles River) and therefore this should be considered to be a significant impact, both through direct adverse effects on sensitive species and interference with migratory wildlife corridors. The DEIR, in contrast, asserts there will be no adverse effects because it asserts that there will be no concentration of avian movement intersecting with the site, which we consider next.

Response P708-8 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Refer to Response P708-11 for a discussion of bird collisions at a comparable aerial gondola system. Refer to Response P708-9 for a discussion of avian movement in the proposed Project area. Refer to Response P708-5 for a discussion of how the proposed Project would not pose a collision risk to nocturnal migrants.

Comment P708-9 Concentrated avian movement. The DEIR makes the claim that the project site is in the middle of a broad coastal plain, lacking topography to concentrate migrants and lacking habitat that would attract birds as stopover locations. These assertions are flawed.

Significance of impacts depends not necessarily on the quantity of birds but on whether sensitive species are affected. Many sensitive bird species migrate through Los Angeles and could encounter the project site.

The assertion that there is no stopover habitat to attract birds ignores the presence of the Los Angeles River and Silver Lake Reservoir Complex, which is a significant stopover habitat for waterfowl, in close proximity to the site. An assessment of this question must look at a broader landscape context than the 500-ft buffer considered in the DEIR because, as noted, birds fly quickly through the air and major stopover locations are found within a few minutes flight from the project site.

Response P708-9 As discussed on page 3.4.13 in Section 3.04, Biological Resources, of the Draft EIR, avian migratory movements tend to be focused along prominent ridgelines, shorelines, and where there is favorable stopover habitat. The proposed Project alignment is on a broad urbanized coastal plain, midway between the coast and the mountains, and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat. As a result, the BSA does not serve as a

regional wildlife corridor, and direct impacts to regional wildlife movement would not occur. Moreover, refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how there is little evidence to suggest that the presence of natural features, such as the Los Angeles River or Silver Lake Reservoir, would result in concentrated migration, specifically in the proposed Project area. The Los Angeles River is heavily impacted and is predominantly a concrete water-conveyance structure. The river corridor does not contain appreciable vegetation until it reaches more than 1 mile north of the proposed Project BSA. The Silver Lake Reservoir is more than 2 miles to the northwest. Waterbirds and other migrants may pass over the proposed Project en route to and from these locations, but there is no reason to believe the movement would be concentrated in the vicinity of the proposed Project (and below 200 feet above ground level) versus along alternate routes. Furthermore, direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment. The 500-foot buffer was determined to be suitable for biological surveys as it is anticipated that indirect project impacts beyond 500-feet in an urban environment would be diffused and would not significantly impact biological resources. Habitats and wildlife occurring outside of this 500-foot buffer were considered to be a sufficient distance away to not be affected by construction or operation of the proposed Project. For instance, both the CDFW (2022) and U.S. Fish and Wildlife Service ([USFWS] 2014) recommend 500-foot disturbance buffers for least Bell's vireos, with protocol surveys in suitable habitat within 500 feet of proposed construction areas. This is, in part, why the 500-foot distance was selected for the BSA.

Comment P708-10 There is another factor that concentrates avian migrants that is entirely ignored by the DEIR: artificial light at night. Nocturnally migrating birds can be tracked on weather radar and research has now shown that light at night escaping upwards is associated with greater numbers of birds present during the day, especially in the fall when juveniles are migrating south (La Sorte et al. 2017). As birds are migrating southward they are attracted to lights and then end up disproportionately using habitats in and around cities as compared with potentially better habitats elsewhere (McLaren et al. 2018). Lights can rapidly increase the density of migratory birds in an area at night. A study of the "Tribute in Light" installation in New York documented an increase from 500 birds within 0.5 km of the vertical light beams before they were turned on to 15,700 birds within 0.5 km 15 minutes after illumination (Van Doren et al. 2017). Downtown Los Angeles also attracts and concentrates birds, especially in the springtime, based on radar measurements (Horton et al. 2019). Dodger Stadium itself creates one of these exceptionally bright points on the landscape and would itself attract and disorient birds, as was seen recently with a Greater White-Fronted Goose at a Dodgers playoff game. Therefore, contrary to the assertions in the DEIR, this location is associated with concentrations of avian migrants.

Response P708-10 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR for discussion of potential project impacts to migratory birds during both construction and operation of the proposed Project. As stated on page 3.4-19 in Section 3.04 proposed Project lighting would be low-level and primarily integrated into the architectural features. Additionally, exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the proposed Project is not anticipated to have an indirect impact on bird and bat species. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin. Furthermore, lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. The lights from Dodger Stadium are angled downward, not upward into the darkness as in the *Tribute in Light* display in New York City (referenced in this comment), and are not nearly as bright or concentrated as that display. If lighting at stadiums were a major attractant to birds during migration, there should be many more examples of this phenomenon, given the large number of professional sports (e.g., baseball, football, soccer), and concert events that occur at such venues at night during spring and fall migratory periods. The occurrence of the greater white-fronted goose that landed at Dodger Stadium in October 2022 is not an indication of a widespread phenomenon.

Comment P708-11 Species susceptible to collision found in project area. The DEIR references a study of grouse and ptarmigan collision with ski lifts (Bech et al. 2012) to conclude that no similar low maneuverability species vulnerable to collision are found in the project area. The DEIR ignores the big message from that paper, which is that searches for carcasses only reveal a small fraction of the birds killed at elevated wires. In that instance, a bird had collided with the wires and was found 600 m (1,969 ft) away, far outside the zone typically searched for mortality at wires. The steep topography of the site may have contributed to this distance, but the genetic linking of an individual bird to feathers underneath an obstruction 600 m away suggests that any current estimates of avian mortality at elevated obstructions are low (Bech et al. 2012).

Response P708-11 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, there are limited empirical data available on avian collision with gondola cables, particularly in urban environments. A review of the literature since the publication of the Draft EIR provided no new information on this topic. As discussed in Appendix B to Appendix G, Memorandum from Doppelmayr Regarding Comparable System Bird Strikes, Doppelmayr USA, one of two manufacturers of 3S gondola systems in the world, noted that a similar 3S gondola project measuring about 0.5 mile long and spanning the Rhine River in an urban environment in Koblenz, Germany was recently approved

for an extension of their operating permit after the first 3 years of operation, noting that no bird strikes were detected during that period. Further, as discussed in Appendix G, avian mortality rates cited in studies associated with transmission lines include mortalities arising from factors other than collision-related trauma, suggesting that avian mortality rate studies may disproportionately attribute avian mortality to collision, rather than other causes of death (which would not occur in association with the proposed Project).

Comment P708-12 The DEIR does not provide important information about what groups of species are more vulnerable to collision (Bevanger 1994, Savereno et al. 1996, Bevanger 1998, Janss 2000). Although all bird species are potentially exposed, the species that are typically at greatest risk are large, heavy, relatively small-winged birds with poor vision (Jenkins et al. 2010). The most susceptible groups tend to be waterbirds and in particular large ducks, geese and swans, pelicans, large herons and waders (Jenkins et al. 2010). Rails, coots, and cranes (Gruiformes) are most frequently recorded birds killed at power lines (Bevanger 1998). Other groups at risk include waterbirds and diving birds such as ducks (Anseriformes) and loons (Gaviformes), which also have high "wing loading," which means that their wings are small relative to their weight (Bevanger 1998). Records of mortality of species in these groups are common also because they are larger, more easily detected, less likely to be carried off by scavenger, and therefore more likely to be recorded. Other species that are theoretically prone to collisions based on their size, wing loading ratio, and vision are found less in surveys, probably because they are smaller and harder to detect (Drewitt and Langston 2008), or travel significant distances after being injured (Bech et al. 2012). These more sensitive groups would include pigeons (including native Columbiformes such as Band-tailed Pigeon and Mourning Dove), some passerines, and highspeed predators such as falcons (Jenkins et al. 2010). Aerial predators, such as swifts, many raptors, and even gulls, are at risk because they spend so much time in flight that have an increased probability of colliding with wires than other species that fly less (Bevanger 1998, Janss 2000).

Response P708-12 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for a discussion of how the proposed Project stations, junction, towers, and cables, are below 200 feet above ground level, whereas most avian flight during migration occurs at thousands of feet above ground level. According to experts in the field of avian collision risk, structures below 200 feet agl contribute negligibly to overall annual bird mortality, even in weather conditions with reduced cloud ceiling. Further, the proposed Project components are located within an urban environment with many other obstacles of similar heights. Therefore, the proposed Project components are not anticipated to contribute significantly to overall annual bird mortality. As discussed in Appendix G of this Final EIR, the collision risk to common bird species arising the proposed Project components is expected to be low. As discussed in Appendix G, the risk of collision for sensitive bird species

would be exceedingly low given the overall low probability of birds colliding with components of the proposed Project in general, and the fact that these species are relatively rare and would comprise a low percentage of bird species present in the vicinity of the proposed Project.

Comment P708-13 In conclusion, the collisions analysis in the DEIR misrepresents the published literature and is not based on substantial evidence. The proposed aerial tramway will kill birds through collisions and the proximity of waterbirds attracted to nearby habitats at the Los Angeles River and Silver Lake Reservoir Complex, combined with the excessive light escaping from downtown Los Angeles (Pack et al. 2017), increases the probability of such collisions and the resulting annual fatality rate. From a CEQA perspective, this represents interference with a migratory pathway and adverse impacts on sensitive species, which are included in the migratory species that traverse Los Angeles routinely. It deserves mention that avian collisions with power lines (or by extension, the proposed aerial tram system) cannot be eliminated through mitigations (Alonso et al. 1994, Brown and Drewien 1995, Janss and Ferrer 1998).

Response P708-13 This comment provides a conclusion regarding the comments raised in this letter. Responses addressing the summarized conclusions raised in this comment are provided in Responses P708-4 through P708-12, and P708-14. As identified in Section 3.04, Biological Resources, of the Draft EIR, the proposed Project would result in less than significant impacts to bird species due to collisions, and therefore no mitigation is required.

Comment P708-14 3 Lighting

The DEIR does not fully describe all sources of lighting. It makes a vague mention of digital billboards (p. ES-11) as follows:

> [E]lectronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations. Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins.

The prospect of LED billboards festooning the towers, gondolas, and stations is not adequately accounted for in the environmental analysis of biological resources and in fact is not considered at all. The aesthetics analysis contains no renderings of the project at night, so decisionmakers are lacking critical information to understand the full impacts of the lighting from the project both for impacts on visual resources and for the impacts of light pollution on biological resources.

Response P708-14 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at

Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id*., § 15204.)

Comment P708-15 The proposed "project design feature" for lighting (AES-PDF-A) violates national standards set by the Illuminating Engineering Society for off-roadway outdoor signage (RP-39-19). The project proposes 10,000 candela per square meter during the day, when the highest allowable brightness by national standards is 3,500 candela per square meter. At night, the project design feature proposes 300 candela per square meter, while the highest allowable brightness for the lighting zone appropriate for a business district (LZ3) is 80 candela per square meter. The portion of the project in the State Park and heading up into Chavez Ravine should probably be classified as LZ2, where the maximum allowable luminance is 40 candela per square meter. LZ3 is defined as, "Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and is required for safety and convenience at night. This is the recommended default zone for large cities' business districts)," and LZ2 is defined as, "Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be required for safety and convenience at night. This is the recommended default zone for light-commercial business districts and high-density or mixed-use residential districts" (Illuminating Engineering Society, RP-39-19, Recommended Practice: Off-Roadway Sign Luminance: An American National Standard).

Response P708-15 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project lighting. The Lighting Study, which is included in Appendix C, Visual Impact

Assessment, of the Draft EIR, analyzed the proposed Project's potential environmental impacts resulting from the proposed Project's lighting and illuminated signage program with respect to light trespass and glare. The proposed Project's lighting design is detailed in Appendix A, Building Lighting Concept Plan, of the Lighting Study, and the proposed Project's illuminated signage design is detailed in Appendix B, Sign Concept Plan, of the Lighting Study. The Lighting Study analyzed the proposed Project for compliance with the Los Angeles Municipal Code, CALGreen, the CASP, the RIO, and the California Vehicle Code and determined that the proposed Project's impacts with respect to light trespass and glare would be less than significant.

The commenter refers to the Illuminated Engineering Society Recommended Practice: Off-Roadway Sign Luminance (RP-30-19). As specified in that document at Section 1.2 Scope the "recommendations provide guidelines only for the lighting of signs that are located off the right of way of roadways—in other words, all signs not regulated by a federal, state, provincial, or local jurisdiction . . ." The proposed Project's signs and lighting are subject to City of Los Angeles and State of California regulations and therefore the recommendations provided in the Illuminated Engineering Society Recommended Practice: Off-Roadway Sign Luminance (RP-30-19) do not apply to the proposed Project. In addition, the Illuminated Engineering Society document clearly indicates that these are only recommendations and the City of Los Angeles and State of California lighting and signage regulations control.

Regarding the application of California Energy Code (CEC) Lighting Zone LZ3 to the Project Site, as discussed on page 12 of the Lighting Study, "[a]ll urban area within California are designated Lighting Zone 3 as default under the CEC, which limits the light trespass illuminance to 8 lux (0.74 footcandles). . . The Project sites are all within the City of Los Angeles which is designated by the CEC as Lighting Zone 3. . . Consistent with this, LAMC Chapter 9, Article 9, Division 5, Sec 99.05.106.8 applies Lighting Zone 3 to the City of Los Angeles by including the following reference to the CEC requirements: 'Comply with lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6. Meet or exceed exterior light levels and uniformity ratios for lighting zone 3 as defined in Chapter 10 of the California Administrative Code, Title 24, Part 1.'" Therefore, since the proposed Project is located entirely within the City of Los Angeles, the propped Project alignment is appropriately categorized as Zone 3.

Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin.

Comment P708-16 The lighting "project design feature" also defines brightness in terms of Watts, which is not useful. Lights have different efficiencies and the restriction that, "Building Lighting will not exceed 60 watts" is not useful unless the lamp type is specified. It

should indicate the total lumens that can be produced per fixture rather than specifying energy consumption. The related limitation on light output for outdoor luminaires of 6,200 lumens is set unreasonably high. That is the equivalent of having ten 60-Watt incandescent bulbs in a single fixture. A "design feature" with this limitation will do nothing to mitigate the impacts of the proposed lighting infrastructure on visual resources or people who are exposed to the lights from their residences.

Response P708-16 Refer to Topical Response K, Signage and Lighting, for a discussion of Project lighting. The Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, analyzed the proposed Project's potential environmental impacts resulting from the Project's lighting and illuminated signage program with respect to light trespass and glare. As discussed on page 55 of the Lighting Study (and within the Lighting Study Appendix A, Building Lighting Concept Plan) the lighting for the proposed Project was designed to provide the necessary illumination for passengers to safely board and enjoy the proposed Project. As explained in the Building Lighting Concept Plan, the illuminance design standards for the Project were developed in accordance with the California Electric Code, the Illuminating Engineering Society (IES) recommendations and transit system operation standards prepared in coordination with the proposed Project's lighting, design, and gondola systems technical consultants. The Lighting Study analyzed the proposed Project for compliance with the Los Angeles Municipal Code, CALGreen, the Cornfield Arroyo Specific Plan (CASP), the Los Angeles River Improvement Overlay District (RIO), and the California Vehicle Code and determined that the proposed Project's impacts with respect to light trespass and glare would be less than significant.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project would result in a less than significant impact to aesthetics including light trespass and glare. Nevertheless, the proposed Project would incorporate project design features related to lighting in order to provide additional environmental benefits and to memorialize the proposed Project's commitment to certain regulatory requirements. Specifically, AES-PDF-A provides some additional detail regarding certain maximum light levels associated with the proposed Project's lighting design with respect to wattage, lumens, and candelas. Final specifics regarding wattage, lumens, and candelas may actually be less than the maximums provided in AES-PDF-A. With respect to the provision in AES-PDF-A providing that "Building Lighting will not exceed 60 watts," this provision was incorporated into the proposed Project to reflect requirements of the CASP. As discussed at pages 9-10 of the Lighting Study, the CASP specifically exempts from its requirements internally illuminated signs, architectural lighting that does not exceed an intensity of 60 watts, and pedestrian lighting that does not have an intensity greater than 60 watts. Accordingly, the 60-watt design element was memorialized in AES-PDF-A to demonstrate the Project's compliance with the CASP.

Regarding the provision in AES-PDF-A providing that "Building Lighting outdoor luminaires will not exceed 6200 initial lumens," this provision was incorporated into the proposed Project to reflect requirements of the California Energy Code (CEC). As discussed at pages 11 – 12 of the Lighting Study, "[t]he 2019 California Energy Code includes the following requirements for Glare:

Section 130.2 OUTDOOR LIGHTING CONTROLS AND EQUIPMENT

'(b) Luminaire cutoff requirements. All outdoor luminaire of 6,200 initial luminaire lumens or greater, shall comply with backlight, uplight, and glare (collectively referred to as "BUG" in accordance with IES TM-15-11, Addendum A) requirements as follows:

1. Maximum zonal lumens for backlight, uplight, and glare shall be in accordance with Title 24, Part 11, Section

5.106.8.

Exception 1 to Section 130.2(b): Signs

Exception 6 to Section 130.2(b): Luminaires that illuminate the public right of way on publicly maintained roadway, sidewalks and bikeways.'"

With the incorporation of AES-PDF-A, the proposed Project's lighting is exempt from the requirements of Section 130.2 because all outdoor luminaires will not exceed 6200 initial lumens. Nevertheless, as explained at pages 11 – 12 of the Lighting Study, the proposed Project's lighting fixtures would also comply with BUG ratings in accordance with IES TM-15-11, Addendum A to limit offsite glare.

Refer to Section 7.0, Mitigation Monitoring and Reporting Program, for the proposed Project's Mitigation Monitoring and Reporting Program, which incorporates the proposed Project's Project Design Features, including AES-PDF-A, as mandatory elements of the proposed Project. Accordingly, Metro has committed to implementing AES-PDF-A.

Comment P708-17 The Visual Impact Analysis in the DEIR does not evaluate whether any of the proposed lighting from the project would violate Los Angles Municipal Code Section 93.0117, which reads:

No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two footcandles (21.5 lx) of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.

3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

EXCEPTIONS: This subsection shall not apply to:

1. Any frosted light source emitting 800 lumens or less.

2. Any other light source emitting more than 800 lumens where the light source is not visible to persons on other residential property.

Given that much of the infrastructure proposed will be several stories in the air, it is highly likely that even if lights are shielded from being directed upward, they will result in direct glare on residences in violation of Municipal Code. The calculations provided in the technical appendix are focused on illuminance measurements, when the code allows no direct glare, regardless of the illuminance. None of the Lighting Design Report calculations show compliance with this code section.

Response P708-17 Page 8-9 of the Lighting Study summarizes the Los Angeles Municipal Code (LAMC) lighting regulations including Los Angeles Municipal Code Section 93.0117. Further, as explained on p. 13 of the Lighting Technical Study, consistent with LAMC 93.0117, the lighting analysis specifically evaluates whether the Project's lighting would result in illuminance "greater than 2.0 foot-candles at a residential property boundary." Accordingly, the lighting analysis does specifically include an evaluation of whether lighting from the proposed Project is in compliance with LAMC Section 93.0117, and the Lighting Technical Study concludes the proposed Project's lighting "will be less than the maximum light trespass illuminance of 2.0 fc at all adjacent residential use properties as stipulated by LAMC." In addition, as noted on page 9 of the Lighting Study, "[s]ome of the Project's lighting is subject to exceptions provided in LAMC Section 93.0117, such as light sources less than 800 lumens, light sources for emergency egress lighting, light sources for traffic and street illumination, and aircraft warning lights. Specifically, the Project's Building lighting is primarily related to the safe operations of the transportation facility. Nevertheless, the requirements of LAMC Sec. 93.0117 are utilized in this Study to present a conservative analysis of any potential Project lighting impacts and the potential exceptions are not applied to the Project's analysis." The Lighting Study also conducted a glare analysis for the proposed Project at pages 49-52, which concluded that the proposed Project would not create high contrast or glare conditions at residential, sensitive sites, or roadway sites.

Comment P708-18 Finally, it is unclear the extent to which the stations will remain illuminated at night and overnight and to what extent the shells of the large canopies are transparent. From the renderings it appears that they are somewhat translucent, and therefore would result in escaping light at night, appearing as large glowing masses in the sky at night.

The lighting report also illustrates several examples of uplighting of structures and landscape elements, which is inconsistent with the text in the DEIR claiming that lights will be "shielded," which normally implies that light would be directed downward (see pp. 3.1-8 and 3.1-9 of DEIR). Uplighting is always an adverse environmental impact and illuminating trees at night is harmful to their health (Briggs 2006, Bennie et al. 2016, Meng et al. 2022) and should be avoided.

Response P708-18 The proposed Project's Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, conducted an analysis of the proposed Project's nighttime lighting. As noted on page 13 of the Lighting Study the analysis of lighting considered the "change in ambient nighttime levels as a result of project sources." Therefore, the proposed Project's Lighting Study was specifically designed to evaluate the proposed Project's nighttime lighting impacts. Refer to Response P708-16, which specifically explains that the proposed Project will be designed in compliance with backlight, uplight, and glare requirements. Refer to Response P708-10 for discussion of how, as stated on page 3.4-19 in Section 3.04, Biological Resources, of the Draft EIR, proposed Project lighting would be low-level and primarily integrated into the architectural features. Additionally, exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats.

Comment P708-19 4. Structure Design Likely to Result in Large Rock Pigeon Roosts

Project designers do not appear to realize that a large open canopy as depicted in the project renderings in the Lighting Design Report, combined with exposed structural beams and girders, is likely to result in large Rock Pigeon roosts. Pigeons can be vectors of disease and their droppings would foul the surfaces in the stations. The DEIR should consider this eventuality and disclose the chemical and/or physical methods that would be used to exclude pigeons from roosting from within these structures. The station design is setting up the operators to be under pressure to undertake ongoing, potentially inhumane, measures to control pigeon numbers.

Sincerely,

Travis Longcore, Ph. D. Catherine Rich, J.D., M.A.

Response P708-19 Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of methods to prevent roosting or nesting opportunities for pigeons. There are numerous non-chemical and non-lethal anti-perching devices (e.g., Nixalite® bird spikes) that can be installed to prevent birds from becoming established. Chemical methods of pigeon removal or control would be avoided. It is also worth noting that the surrounding area contains numerous potential roosting and nesting opportunities (e.g., in the nearby buildings and billboard signs), and that the stations and junction themselves would not be drawing pigeons into the area and concentrating them above current levels. Refer to Section 5.0, Corrections and Additions, as in response to comments, the proposed Project has committed to implementing BIO-PDF-D and

avoid using any rodenticides and second-hand generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second-generation anticoagulant rodenticides.

Comment P708-20 5 About the Authors

Dr. Travis Longcore and Catherine Rich are principals of Land Protection Partners. Dr. Longcore is Associate Adjunct Professor in the Institute of the Environment and Sustainability at UCLA. He has taught, among other courses, Bioresource Management, Environmental Impact Analysis, Field Ecology, and Ecological Factors in Design. He was graduated *summa cum laude* from the University of Delaware with an Honors B.A. in Geography, holds an M.A. and a Ph.D. in Geography from UCLA, and is professionally certified as a Senior Ecologist by the Ecological Society of America and as a GIS Professional by the Geographic Information System Certification Institute. He is a 24-year member of the Los Angeles County Environmental Review Board. Catherine Rich is Executive Officer of The Urban Wildlands Group. She holds an A.B. with honors from the University of California, Berkeley, a J.D. from the UCLA School of Law, and an M.A. in Geography from UCLA. She is lead editor of *Ecological Consequences of Artificial Night Lighting* (Island Press, 2006) with Dr. Longcore. Longcore and Rich have authored or co-authored over 60 scientific papers in top peer-reviewed journals such as *Auk, Biological Conservation, Conservation Biology, Environmental Management, Frontiers in Ecology and the Environment, Trends in Evolution and Ecology, and Urban Forestry and Urban Greening.* Longcore and Rich have provided scientific review of environmental compliance documents and analysis of complex environmental issues for local, regional, and national clients for 23 years.

Response P708-20 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P708-21 6 Literature Cited

Alonso, J. C., J. A. Alonso, and R. Muñoz-Pulido. 1994. Mitigation of bird collisions with transmission lines through groundwire marking. Biological Conservation **67**:129–134.

APLIC. 2006. Suggested practices for avian protection on power lines: the state of the art in 2006. Edison Electric Institute, Avian Power Line Interaction Committee, and California Energy Commission, Washington, D.C. and Sacramento, California.

Bech, N., S. Beltran, J. Boissier, J. F. Allienne, J. Resseguier, and C. Novoa. 2012. Bird mortality related to collisions with ski-lift cables: do we estimate just the tip of the iceberg? Animal Biodiversity and Conservation **35**:95–98.

Bennie, J., T. W. Davies, D. Cruse, and K. J. Gaston. 2016. Ecological effects of artificial light at night on wild plants. Journal of Ecology **104**:611–620.

Bernardino, J., K. Bevanger, R. Barrientos, J. F. Dwyer, A. T. Marques, R. C. Martins, J. M. Shaw, J. P. Silva, and F. Moreira. 2018. Bird collisions with power lines: state of the art and priority areas for research. Biological Conservation **222**:1–13.

Bevanger, K. 1994. Bird interactions with utility structures: collision and electrocution, causes and mitigation measures. Ibis **136**:412–425.

Bevanger, K. 1998. Biological and conservation aspects of bird mortality caused by electricity power lines: a review. Biological Conservation **86**:67–76.

Briggs, W. R. 2006. Physiology of plant responses to artificial lighting. Pages 389–411 in C. Rich and T. Longcore, editors. Ecological Consequences of Artificial Night Lighting. Island Press, Washington, DC.

Brown, W. M., and R. C. Drewien. 1995. Evaluation of two power line markers to reduce crane and waterfowl collision mortality. Wildlife Society Bulletin **23**:217–227.

Brown, W. M., R. C. Drewien, and E. G. Bizeau. 1987. Mortality of cranes and waterfowl from powerline collisions in the San Luis Valley, Colorado. Pages 128–136 in Proceedings 1985 Crane Workshop. Whooping Crane Maintenance Trust, Platte River, Grand Island, Nebraska.

Drewitt, A. L., and R. H. W. Langston. 2008. Collision effects of wind-power generators and other obstacles on birds. Annals of the New York Academy of Sciences **1134**:233–266.

Farnsworth, A., S. A. Gauthreaux, Jr., and D. van Blaricom. 2004. A comparison of nocturnal call counts of migrating birds and reflectivity measurements on Doppler radar. Journal of Avian Biology **35**:365–369.

Farnsworth, A., and R. W. Russell. 2007. Monitoring flight calls of migrating birds from an oil platform in the northern Gulf of Mexico. Journal of Field Ornithology **78**:279–289.

Horton, K. G., C. Nilsson, B. M. Van Doren, F. A. La Sorte, A. M. Dokter, and A. Farnsworth. 2019. Bright lights in the big cities: migratory birds' exposure to artificial light. Frontiers in Ecology and the Environment **17**:209–214.

Janss, G. F. E. 2000. Avian mortality from power lines: a morphologic approach of a species-specific mortality. Biological Conservation **95**:353–359.

Janss, G. F. E., and M. Ferrer. 1998. Rate of bird collision with power lines: effects of conductor-marking and static wire-marking. Journal of Field Ornithology **69**:8–17.

Jenkins, A. R., J. J. Smallie, and M. Diamond. 2010. Avian collisions with power lines: a global review of causes and mitigation with a South African perspective. Bird Conservation International **20**:263–278.

Korschgen, C. E., W. L. Green, W. L. Flock, and E. A. Hibbard. 1984. Use of radar with a stationary antenna to estimate birds in a low-level flight corridor. Journal of Field Ornithology **55**:369–375.

Kunz, T. H., S. A. Gauthreaux, Jr., N. I. Hristov, J. W. Horn, G. Jones, E. K. V. Kalko, R. P. Larkin, G. F. McCracken, S. M. Swartz, and R. B. Srygley. 2008. Aeroecology: probing and modeling the aerosphere. Integrative and Comparative Biology **48**:1–11.

La Sorte, F. A., D. Fink, J. J. Buler, A. Farnsworth, and S. A. Cabrera-Cruz. 2017. Seasonal associations with urban light pollution for nocturnally migrating bird populations. Global Change Biology **23**:4609–4619.

Longcore, T., C. Rich, and S. A. Gauthreaux, Jr. 2008. Height, guy wires, and steady-burning lights increase hazard of communication towers to nocturnal migrants: a review and meta-analysis. Auk **125**:485–492.

Mabee, T. J., and B. A. Cooper. 2004. Nocturnal bird migration in northeastern Oregon and southeastern Washington. Northwestern Naturalist **85**:39–47.

Mabee, T. J., B. A. Cooper, J. H. Plissner, and D. P. Young. 2006. Nocturnal bird migration over an Appalachian ridge at a proposed wind power project. Wildlife Society Bulletin **34**:582–590.

McLaren, J. D., J. J. Buler, T. Schreckengost, J. A. Smolinsky, M. Boone, E. E. van Loon, D. K. Dawson, and E. L. Walters. 2018. Artificial light at night confounds broad-scale habitat use by migrating birds. Ecology Letters **21**:356–364.

Meng, L., Y. Zhou, M. O. Román, E. C. Stokes, Z. Wang, G. R. Asrar, J. Mao, A. D. Richardson, L. Gu, and Y. Wang. 2022. Artificial light at night: an underappreciated effect on phenology of deciduous woody plants. PNAS Nexus **1**:pgac046.

Pack, D. W., B. S. Hardy, and T. Longcore. 2017. Studying Earth at night from CubeSats. Pages 1–11 *in* Proceedings of the 31st Annual AIAA/USU Conference on Small Satellites.

Savereno, A. J., L. A. Savereno, R. Boettcher, and S. M. Haig. 1996. Avian behavior and mortality at power lines in coastal South Carolina. Wildlife Society Bulletin **24**:636–648.

Van Doren, B. M., K. G. Horton, A. M. Dokter, H. Klinck, S. B. Elbin, and A. Farnsworth. 2017. High-intensity urban light installation dramatically alters nocturnal bird migration. Proceedings of the National Academy of Sciences **114**:11175–11180.

Williams, T. C., J. M. Williams, P. G. Williams, and P. Stokstad. 2001. Bird migration through a mountain pass studied with high resolution radar, ceilometers, and census. Auk **118**:389-403.

Response P708-21 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. The cited documents were considered in connection with their respective comment.

Comment Letter P709 - Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P709

Comment P709-1 Dear Mr. Zelmer and Metro,

I am writing this letter in OPPOSITION to the Los Angeles Aerial Rapid Transit Project ("The Gondola" to Dodger Stadium, or "The Gondola Project"). The following are a list of concerns that I would like to add to my previous comment letters:

Response P709-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P709-2 through P709-34.

Comment P709-2 Process/Transparency

By allowing this project to move forward to environmental review without a feasibility study, Metro has allowed Frank McCourt to bully our community. It's hard to describe the impact of this. The gondolas would fly directly over my neighborhood. The 98ft tall Broadway Junction would be noisy and imposing. One of my neighbors has said that she has had a lot of anxiety about this project, about the uncertainty of it coming into our neighborhood.

Response P709-2 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. The Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the less than significant noise impacts from operations of the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby

residential and open space uses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P709-3 The following is a speech I gave at a "convening" to introduce a number of community organizations to the gondola project and our efforts to organize against it. I hope it provides a sense of the impact that this project has already had on our community:

> I'm a resident on a street called Savoy that's on the other side of Broadway from this park. My sister and I became homeowners here 10 years ago. We got lucky after two years of searching and bidding wars. Our mom has always encouraged us to own, to have that security and stability, and we love our house. It's over 125 years old, and we've spent many years working on it, and making it our home.
>
> But even more important than the house itself, we've become a part of the community. Many of my neighbors have been here for decades. There are families raising their kids here, seniors who walk and take the bus, some who speak a little English, some none at all. It's a neighborhood where people grow and share fruit and vegetables. When the LA Times reporter was here, my 95-year-old neighbor would not let her leave without a bag of vegetables. Some of our neighbors gave us rice dumplings a couple of weeks ago when it was good luck to eat them. It's a neighborhood where people look out for each other.

Response P709-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P709-4 Living here, there's Dodger traffic, high school traffic, even concerts in this park. But those things we sort of expect and can deal with. What we never expected was that a billionaire would want to build a massive gondola project over us, and be given a fast pass by Metro to do it.

Four years ago, in 2018 when the gondola was first announced, it was just a concept. No route was proposed. But the next time we heard about it was two years later, with the notice of preparation for the EIR. McCourt's company decided on their two routes, both over my neighborhood, and they made that decision without holding even one public meeting.

Response P709-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed

Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P709-5 I guess maybe McCourt didn't want us to know about his plan to invade our neighborhood with his urban gondola experiment. His people like to compare these gondolas to those in South America, but these would be much larger, with 40-person cabins swooping over us all day long, all year long, and very late at night. They would go directly over us, only 40 feet above our roof. How would you like to live under that?

Response P709-5 Refer to Response P709-4 for discussion of the Project Sponsor. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the

proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In cities such as Toulouse, France, comparable urban 3S gondola systems demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P709-6 Real estate is a big business, but some of us just want to live in our homes, and have some peace, security and stability in our community. Crazy projects like this threaten all of that. It's like we can't even own our little part of our neighborhood. We're at the mercy of a billionaire who can force his project on us.

Even today, there's still no feasibility study. All we have are McCourt's promises that this system will be safe, quiet, and take thousands of cars off the roads. Personally, I'm getting tired of billionaires making big promises they clearly can't keep, when it's all of us in the community who would live with the consequences.

People have told me, "You can't fight it. The people behind this are too rich and powerful. Just negotiate and get what you can." But I look at it another way. I shouldn't be bullied into selling my home and losing my community. I shouldn't be told, "This gondola is happening, so you can either sell and leave, or you can live under it." I don't want to be threatened or intimidated.

We are a lower income community, a community with many non-English speakers, a lot of renters. McCourt probably figured we wouldn't have the resources to fight him in court, and in some ways that might be true. But I'm grateful that The California Endowment is fighting back with their lawsuit. I'm also grateful for any allies who will join us in this fight. I'm grateful that you are here today, because I know that by joining forces we can be stronger than McCourt ever thought.

Thank you.

Response P709-6 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Response P709-2 and P709-4 regarding the sufficiency of the Draft EIR and how the proposed Project's public outreach and engagement process meets CEQA's requirements. The Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts of the proposed Project, which would be less than significant. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety features of the proposed Project. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P709-7 Privacy

A gondola cabin approaching my home on Savoy Street would have a view looking into my living room window, and then into my bedroom if the bedroom door is open. You could literally see my bed. This is when the gondola is approaching my home, not when it is directly over my property. This is why my neighbors and I need more information about the "smart glass" system and how it would be implemented. When or where would the windows of the gondola cabins automatically fog up, and which windows would actually fog up. I imagine that LA ART would like to keep this to a minimum because it would be annoying and disconcerting for gondola passengers if the windows are constantly fogging up. Would the gondola operator be able to disable this feature easily, and how would we file a complaint if we notice it's not working?

Response P709-7 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be

located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views. This is done by running a small electric current through the pane of glass; when the electric current passes through the pane of glass, it changes the glass from opaque to transparent, and vice versa. The control system for the proposed Project can be programmed to turn on and off the privacy glass while cabins are adjacent to sensitive views.

Comment P709-8 Future development

The preferred alignment would fly within my air rights at 451 Savoy St. However, The Gondola is a private company's project, and private companies cannot use eminent domain. This suggests that Design Option A is the only viable alternative because we are not transferring our air rights to The Gondola Project. However, Design Option A crosses over the airspace of Cathedral High School, a historic property. Has the high school given permission to use their airspace for this project?

Even if this design option is chosen, which does not require the airspace directly over my property, The Gondola could still affect my ability to build or rebuild on my property should the need arise (natural disaster, fire, a gondola catastrophe, etc.). It would be detrimental to the value of any upper floor units that would have windows at approximately gondola level as they pass by our property. It could also prevent the use of a crane or other tall equipment to assist in the construction.

Response P709-8 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2.0, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. As discussed in Section 2.4.6, Aerial Clearance, of the Draft EIR, the proposed

Project will comply with industry standards for the design and operation of ropeways and cabins, including ANSI B77.1, regulating vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles, pedestrians, vegetation, buildings, and other structures. Refer to Appendix Q, Proposed Alignment Plan and Profile, for an overview of aerial rights requirements as part of the proposed Project, including over 451 Savoy Street. How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR.

Comment P709-9 Noise Study

In the noise analysis, the noise from the LA ART gondola stations is estimated using a model developed by Rossi in 2011. I am requesting an explanation of this model and its limitations that a lay person can understand. Although a list of assumptions is provided, there's not really a discussion about the soundness of these assumptions.

I'm concerned that the noise analysis underestimates the noise from the gondola cabins. People tend to be drunk or rowdy after Dodger games and events. This will create more noise than inside the gondola cabins that are flying over our homes until midnight than is described in the DEIR. There will not only be the average and consistent noise, but also the hooting and hollering that is disturbing to peaceful enjoyment of our homes, and shouldn't be averaged out in the noise analysis. The DEIR also should account for peak noise from a person screaming in the cabin.

Response P709-9 Refer to Topical Response P, Gondola System Noise Modeling, of the Final EIR, for discussion of the noise model used to predict noise levels from operations of the proposed Project and how use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated and has been shown to result in a conservative assessment of the noise generated by the proposed Project.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. As noted on page 3.13-57 of the Draft EIR, an analysis was conducted to evaluate the noise from the gondola cabins as they travel between the stations, towers and junction in proximity to receptor locations. Cabin noise might be expected from the people traveling inside the cabin and any heating, ventilation, and air conditioning (HVAC) equipment associated with the cabin. The proposed Project would implement project design feature NOI-PDF-A that provides specifications regarding the interior-to-exterior noise reduction of the gondola cabins as well as the sound power level of the HVAC system. Refer to Response GO17-130 for analysis of operational noise impacts associated with sleep disturbance, which includes an analysis that uses the Sound Exposure Level (SEL) acoustics metric. As identified therein, operational noise impacts associated with

sleep disturbance would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how standard operating hours for the proposed Project would typically be between 6:00 AM and 12:00 AM, subject to operational changes due to ridership demand.

Comment P709-10 If we're comparing transit systems, the Portland system does not run as late and serves people who are going to a hospital. That's a very different situation. The LA ART Gondola would serve a major events stadium and flies low over a residential neighborhood AND will operate until midnight, possibly later in order to accommodate events that end late, such as the Elton John concert. For this reason, cabins need more soundproofing than glass that is similar to automobile glass.

Response P709-10 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems such as the Portland Aerial Tram demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential uses, including historical residential neighborhoods. Refer to Response P709-9 for discussion of the operational noise impacts of the proposed Project, which would be less than significant. As detailed in Section 2.0, Project Description of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, including to extend the hours for concerts and other events at Dodger Stadium.

Comment P709-11 The Elton John concert ended at 11:15pm. I am skeptical that for an event like that, the operator of the gondola would really stop running the system at midnight. This project would put a noisy station in the middle of a residential neighborhood and fly cabins with rowdy people very low my neighborhood. That is a lot of noise and disturbance to introduce into a residential neighborhood that includes children and seniors and many single-family homes that are over 100 years old that don't have modern soundproofing. My home is 127 years old, and my neighbor's home is 131 years old.

Response P709-11 Refer to Response P709-9 for discussion of operating hours for the proposed Project. As discussed on page 2-42 of Section 2.0, Project Description, of the Draft EIR, standard operating hours would be between 6:00 AM and 12:00 AM, subject to operational changes due to ridership demand. Due to anticipated nighttime operations, Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, analyzed both daytime and nighttime operational impacts, which would be less than significant.

Comment P709-12 Los Angeles State Historic Park

The DEIR does not include any renderings showing the Broadway Junction as viewed from inside LA State Historic Park. Given that it sits on the bluff on Broadway, and is

98ft tall, this will be a huge part of the view. There is currently nothing of this size and scale on Broadway next to the park.

Response P709-12 The Draft EIR addressed aesthetic impacts in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment, of the Draft EIR. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

While the Draft EIR and Visual Impact Assessment did not determine that the specific view of Broadway Junction from the park was significant, they did specifically address and disclose potential impacts on changes in the visual environment and existing viewsheds into and from within the park, as well as analyzed visual impacts that could occur as a result of the addition of Broadway Junction.

The Draft EIR included the identification of six Landscape Units (LUs) divided into thirty Key Observation Points (KOPs). LUs 4 and 5 specifically addressed potential alterations to the visual landscape as a result of the addition of Broadway Junction, and nine KOPs simulated views of or from the park. The Draft EIR recognized the potential visual impact that could occur as a result of the addition of Broadway Junction, noting that its 98-foot height could alter changes to views as compared to the existing landscape. However, the analysis conducted for LU 4 and LU 5 explained that the design of Broadway Junction would include architectural styles, colors, and materials that are comparable and similar to the aesthetic make-up of the surrounding urban environment. The design also includes the addition of new trees and landscaping below the junction that would create a visual improvement over the existing fencing. Finally, the height of Broadway Junction is comparable in height to future development approved for addition to the area. Overall, the design would ensure the addition of Broadway Junction would not greatly alter the existing or approved future aesthetic of the surrounding environment or distract from any surrounding viewsheds. The Draft EIR additionally analyzed nine KOPs that simulated views of or from within the park that were chosen in consultation with responsible

agencies. The Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park.

As a result of this analysis, the Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the Park. Nevertheless, the Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental KOPs, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P709-13 Reliability and Safety

The 3S gondola in Toulouse, France has not been reliable so far. It broke down 5 times in the first month, and then went off-line for two weeks only three months after opening, to perform their annual maintenance. Then it broke down again two months later. It broke down one time and left a teenage boy stuck in the hot cabin for 1 hour. It broke down again last week, on January 10, 2023, because of a computer malfunction. This is not yet proven technology for public or urban transit. Teleo has a much smaller rated capacity. A larger capacity system, as proposed for LA ART, is probably even harder to maintain.

Response P709-13 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with their surrounding urban environments. In addition, as discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator. Operational disruptions resulting from equipment issues would be minimized through robust design and periodic and preventative maintenance.

Comment P709-14 Alpine Tower

Taking another lane from Alameda for the Alpine tower seems shortsighted. This takes away space on Alameda Street for this project that could be put to better use, such as a bike lane or bus lane. Chinatown has practically no bike lanes.

Response P709-14 This comment suggests that the Alpine Tower would require that a traffic lane on Alameda Street be eliminated. This is not accurate. A comparison of the Alpine Tower |Existing diagram on page 25 and the Alpine Tower |Build-Out diagram on page 31 in Appendix B, Construction Assumptions, Exhibit 1, Overview of Construction Phasing and Area Conditions, of the Draft EIR shows that the same number of travel lanes will be provided on Alameda Street after construction of the Alpine Tower is complete as there are under existing conditions. Moreover, the Alpine Tower would not preclude the City repurposing existing space on Alameda Street for other uses.

Comment P709-15 Land Use Compatibility

I am not aware of any other 3S gondola systems with open air stations or junctions that are situated in a residential neighborhood and this close to homes. This seems like an incompatible use that would be incompatible with the City of LA's land use and zoning. Yet in the draft EIR, LA ART claims that this project is compatible with the City's land use policies. This seems highly unlikely to us, especially because representatives from LA ART made public comments to the City Planning Commission asking for the Downtown Community Plan to consider provisions for aerial transit.

Response P709-15 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Such comparable aerial transit systems include open air stations in residential areas. The Draft EIR addressed land use compatibility in Section 3.11, Land Use and Planning, of the Draft EIR. As discussed in Section 3.11, an analysis of land use compatibility was provided which addressed whether the proposed Project would be compatible with the land use plans and policies applicable to the Project alignment in terms of use, size, intensity, land use designation, density, scale, or other factors. In addition, a consistency analysis of the proposed Project was conducted with local plans and documents including the Dodger Stadium Conditional Use Permit, and the City of Los Angeles General Plan, including the Community Plans, Alameda District Specific Plan, Cornfield Arroyo Seco Specific Plan, City of Los Angeles Municipal Code and RIO District Ordinance.

The proposed Project's consistency with plans, programs and policies was also further analyzed in other sections of the Draft EIR including Air Quality (Section 3.3), Transportation (Section 3.17), Open Space (Section 3.16), Public Facilities & Services (Section 3.15), Noise (Section 3.13), and Housing (Section 3.14). Refer to Section 5.0,

Corrections and Additions, for a discussion of the proposed Project's consistency with the recently adopted Downtown Los Angeles Community Plan.

Comment P709-16 I would like to include this document in the record for the DEIR for this project: "Gothenburg – Cable Car Best Practices Report." This report from 2016 has a review of 3S Gondola systems and considerations for implementing such systems with an intermediate station. The following are excerpts from the report, which I believe are relevant to the DEIR for the LA ART Gondola to Dodger Stadium (https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport_best-practices.pdf):

> "To address this question, CCC compiled and documented all tricable detachable gondolas (3S) in the world. It was found that at the time of this report's writing (January 2016), only thirteen 3S systems were operational while six 3S cable cars were in the various stages of planning and construction."
>
> "However, only two 3S systems are built with mid-stations. This suggests that it is very challenging to directly address best practices for 3S systems with upper floor mid- stations. To further compound this challenge, Gothenborg's cable car system is still undergoing planning and review and therefore, specific design specifications of the system (i.e., location of multi-storey stations, location of return/drive station and etc.) were not disclosed to the Consultants. As such, CCC can only discuss and answer the aforementioned question and best practices for upper level gondola stations in generalities."

Response P709-16 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how, due to the length and geometry of the proposed Project, the proposed Project would include three passenger stations and one non-passenger junction, which include the Chinatown/ State Park Station and the Broadway Junction as two intermediate components along the proposed Project alignment. The Broadway Junction would be a non-passenger facility that is required for the proposed Project system in order to turn the cables of the proposed Project and remain along the alignment. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world. Since 2016, additional 3S gondola systems have been constructed with mid-stations, including the Eisgratbahn in Austria and TÉLÉO in Toulouse, France.

Comment P709-17

Operational Challenges	*Comment / Description*
Location of Drive vs Return Stations	• *Station will need to be designed appropriately to handle the forces/stresses applied onto building depending on the final locations of drive and return stations.* • *Return stations have less infrastructure components while drive stations have more*

	function-related components (i.e. main drive machinery, auxiliary motors, diesel generator • *Drive stations are generally built over two floors. The machinery room is often times built beneath the station to reduce noise.*

Response P709-17 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the mechanics of the proposed Project system, including the locations of the "drive bullwheels" and the "return bullwheels." The proposed Project will not include diesel generators. The proposed Project will provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant.

Comment P709-18

Accessibility Requirements	• *To ensure universal access, many transit agencies now require elevator access for above ground stations. The number and height of elevator systems can add sizable costs and design complexities to a project (i.e. space requirements for elevators). For instance, multi-storey stations may require up to four elevators to provide sufficient service in order to provide access to both sides of the platform. It is also needed in an event that one malfunctions, there's a backup elevator.*

Response P709-18 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the vertical circulation elements of the proposed Project. At Alameda Station, vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as parking and loading area for El Pueblo. On the east, vertical circulation elements would be introduced at-grade from the planned LAUS Forecourt. At Chinatown/State Park Station, access to the boarding platform would be from the mezzanine via elevators, escalators, and stairs. Access to the mezzanine would be available via elevators, escalators, and stairs from the ground level. At Dodger Stadium Station, cabins would arrive and depart from an at-grade boarding platform, with the passenger queueing area also at-grade. In addition, refer to Section 2.0 and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion how the station boarding process and cabins would

comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Comment P709-19

Changing Heavy Machinery and Parts	• *For multi-level stations, a strategy to change heavy machinery and parts (i.e. gearboxes, motors and etc.) will be required in case parts are broken* • *For instance, if a station is 4 storeys high, project proponents must design and have strategies in place to remove and deliver machinery*

Response P709-19 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how bridge cranes would allow the insertion or removal of equipment as may be required for maintenance activities. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine.

Comment P709-20 *"High ridership cable cars must be built with sufficient loading space throughout the station. Poor queuing strategies may reduce passenger satisfaction and safety."*

"The Funivia del Renon is one of the few, if not only, 3S cable cars with a loading/ unloading platform built on the second floor. Unfortunately, due to its popularity during high season, low capacity, poor queuing strategy and limited station footprint, this results in an overflow of passengers queuing haphazardly along the staircase."

"However, sensitively incorporating a 3S cable car into an elevated mixed-use building adds complexity to a project. Designers must deal with issues related to noise, vibration, space availability and perhaps most importantly, access.

A loading platform located many storeys above ground level will exacerbate this problem and will require an accompanying system of elevators, stairs and/or escalators. The capacity of these systems linking to platform can ultimately limit (i.e., bottlenecks) the overall capacity of the cable car."

Response P709-20 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the boarding platforms at Alameda Station, Chinatown/State Park Station, and Dodger Stadium Station have been sized to accommodate the capacity of the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of queues. Refer to Section 2.0, Project

Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant.

Comment P709-21 Traffic / Transportation

How would the Dodger Stadium gondola station affect Circulation of Vehicles and pedestrian traffic around the Downtown Gate? Will it cause a bottleneck before and after games? I ask that an analysis of the vehicle circulation around the Dodger Stadium gondola station be done.

If people who are waiting in line for the gondola after a game or event become restless after 1 or 1.5 hours, won't many of them start walking down the road at the Downtown Gate? This seems like a likely outcome. Walkways need to be provided between the Gondola Station and Stadium Way for this purpose. Where there are already sidewalks, they need to be widened, improved, and maintained. This needs to be done regardless of whether there is a ticketing system for people to reserve tickets after games and events, in case the ticketing system goes down.

Will the LA ART Gondola bring more rideshare traffic into my neighborhood, which is close to the Downtown Gate? Residents in some neighborhoods around Dodger Stadium have reported rideshare drivers using their neighborhoods as waiting areas, and noted that the rideshare companies actually encourage it by paying them a bonus. Will this happen in my neighborhood? There needs to be mitigation for this likely impact. This is just one example of how this gondola project would likely bring more traffic, congestion, and pollution into our neighborhoods, not less.

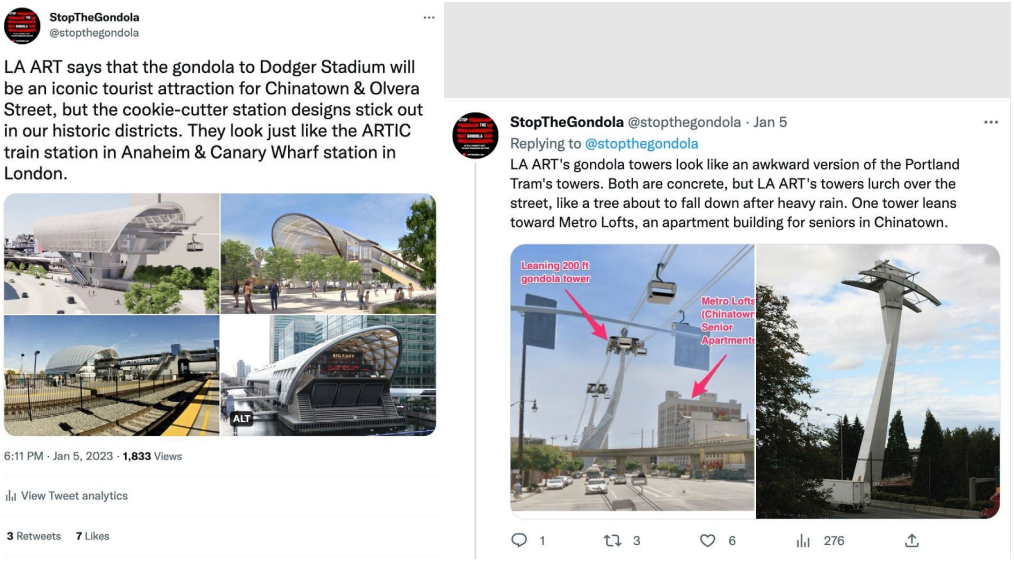
Response P709-21 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. The proposed Project is not expected to increase the number of pedestrians or vehicles accessing Dodger Stadium. The vast majority of visitors drive their personal vehicles to access Dodger Stadium. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. As such, the number of vehicles approaching the Downtown Gate would likely decrease, rather than increase. Within the Dodger Stadium parking lot, people walking between the

stadium to the Dodger Stadium Station would be managed via traffic control officers pre- and post-game and would not affect circulation outside the Downtown Gate.

The Los Angeles Dodgers only allow transportation network company ("TNC") vehicles, e.g., Uber and Lyft, to enter the Dodger Stadium property via the Sunset Gate A since pick-ups occur in Lot 11 near the Sunset Gate. In addition, the Sunset Gate A is the only gate that allows inbound traffic after a game.[42] Therefore, the proposed Project is not expected to increase the number of TNC vehicles near the Downtown Gate.

Refer to Topical Response B, Ridership Model; Queueing and Pre-game and Post-game Transportation, for discussion of post-game transportation management, including the potential for proposed Project riders to leave Dodger Stadium via other modes such as rideshare or walking.

Comment P709-22 Aesthetics



Gondola station and designs should not be cookie cutter or generic. This would be built at the birthplace of our city. LA ART claims this will be iconic, but how is the design iconic? There is no sense of place. Stations look generic and towers are a stark gray concrete. We don't need more gray concrete in our historic neighborhoods. The cabins also appear to be standard cabins.

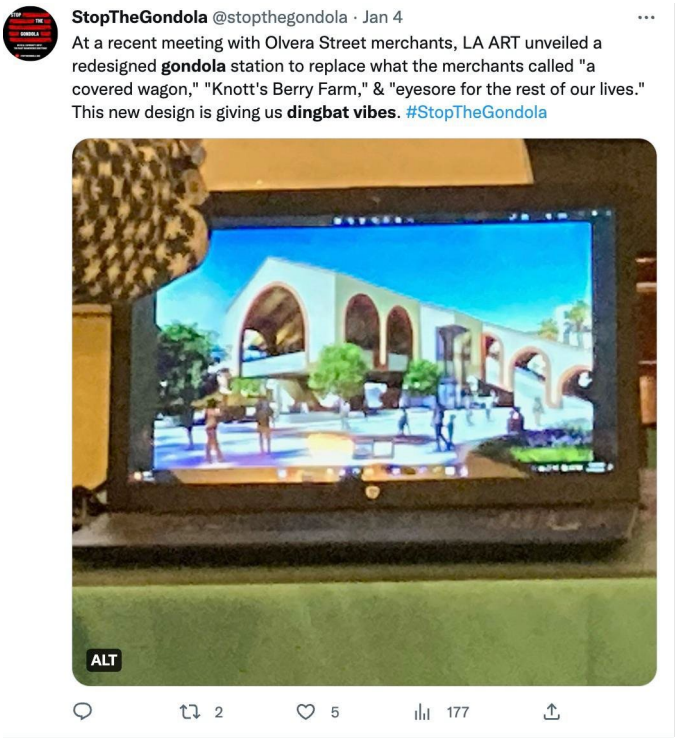
Response P709-22 Refer to Topical Response C, Project Features, for discussion of how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with

[42] Los Angeles Dodgers. 2022. Car Service and Taxi. Available at: https://www.mlb.com/dodgers/ballpark/transportation/car-service-and-taxi. Accessed August 2023.

and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the stations, towers, and junction for the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's stations, towers, and junction, which would be less than significant, and for visual simulations of each component. The Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Both the Chinatown/State Park Station and Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. The Broadway Junction was designed to create a pattern evocative of layered bamboo canes, while still achieving a transparency that brings lightness to the form. In addition, the canopy of the Broadway Junction was designed to reflect warm tones and detailing that is complementary to the existing structures and the residential fabric in the surrounding urban environment. The Dodger Stadium Station and Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Dodger Stadium Station and Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium.

Comment P709-23



The "improved" station design that was recently presented to a group of El Pueblo merchants looks awkward, and like a dingbat, which is more of a mid-century style.

Response P709-23 Refer to Topical Response C, Project Features, for discussion of how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder groups. Refer to Response 709-22 for a discussion of the proposed Project's Alameda Station design.

Comment P709-24

The tower leaning towards Metro Lofts looks like it could fall on the building. Even if it's engineered not to, it looks like it could fall down, which is bad Feng Shui. This seems culturally insensitive, considering that many Chinese seniors live at Metro Lofts.

Response P709-24 Refer to Section 2.4.1, Design, of Section 2.0, Project Description, of the Draft EIR, for a discussion of how the proposed Project's towers were designed to not impede adjacent vehicular and pedestrian circulation, while supporting the ropeway and cabins that are primarily aligned above the public ROW. The neutral-light tone grey is intended to conform with the surrounding environment and will not provide a highly metallic or mirrored finish to minimize glare. Refer to Appendix F, Memo on Structural Engineering, to this Final EIR for a discussion of how the proposed Project's stations, junction, and towers were designed to meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety.

Comment P709-25 Alternatives

More alternatives should be studied. There are many ways to strengthen or build upon the existing infrastructure. The Yale Street bridge that crosses the 110 FWY needs more lighting. This would be a benefit to both residents and Dodgers fans. People have long talked about adding stairs and escalators up the hill to Dodger Stadium. They have those in Medellin, Colombia as well.

"How giant outdoor escalators transformed a Colombian neighborhood" https://www.cnn.com/travel/article/colombia-medellin-neighborhood/index.html

"Tear Up the Dodger Stadium Parking Lot"

https://legal-planet.org/2018/11/02/tear-up-the-dodger-stadium-parking-lot/

Response P709-25 Public Resources Code Sections 21001(g), 21002.1(a), and 21061 require that an EIR identify alternatives to a proposed project. CEQA Guidelines Section 15126.6(a) expands on the statute by stating that an EIR must include a "reasonable range" of alternatives to the project "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Likewise, CEQA Guidelines Section 15126.6(f)(2)(A) further clarifies that an EIR is not required to analyze alternatives that would not eliminate or substantially reduce significant adverse effects. An agency's selection and consideration of alternatives is governed by a "rule of reason." (CEQA Guidelines, § 15126.6, subd. (a).) Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, as required by CEQA, the alternatives analysis included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project. (See CEQA

Guidelines § 15126.6, subd. (e).) CEQA also requires that an EIR identify one "environmentally superior alternative" from the range of reasonable alternatives that are evaluated; the "environmentally superior alternative" cannot be the "No Project" alternative or the underlying project. The Draft EIR considered a "No Project Alternative," the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. Evaluation of each of the alternatives included a description of the alternative, the environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area, and the environmental impacts of each alternative as compared to the proposed Project, followed by a general discussion of the extent to which the underlying purpose and project objectives are obtained by the alternative. Further, in compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the project objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements. Refer to 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P709-26 Please also include in the record the following statement that I made at the January 12, 2023, DEIR meeting:

I'm Phyllis. I live over there. The gondola would fly over me and my neighbors. And my house would face the mouth of the noisy Broadway Junction, a 98ft tall turning station.

Response P709-26 This comment refers to Comment P525-1. Refer to Response P525-1.

Comment P709-27 I think you've seen how this hearing is not right, the way they are taking public comment. It's been like this since the beginning. Trying to hide, and not let it get out about how horrible this project is.

This project is not for us. This project is for Frank McCourt who is a developer, it's for the Olympics, which is for developers, and it's for the politicians who are in the pockets of developers. Frank McCourt wants to build right over us, 40 ft over my neighborhood, as if we're nameless faces. But we're not. We're a real community. I'm glad my sister and my neighbors are here tonight, as well as all of these residents and supporters in the larger community. It's really great to see people show up for each other and speak out.

Response P709-27 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response P709-4 for discussion of outreach and community engagement during the Draft EIR scoping period and the Draft EIR public review period.

Comment P709-28 There have been so many lies about this project from LA ART. But we know what this project is really about. Frank McCourt wants to build a giant complex up at the Dodger Stadium parking lot. It's not a secret. If he has a permanent transit stop, that would give him incentives to build a massive development there.

Response P709-28 Refer to Section 2.0, Project Description, of the Draft EIR for a description of the proposed Project, and Section 2.3.7, Purpose and Need, of the Draft EIR for an overview of the need for the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The proposed Project addresses the need for a permanent transit connection to Dodger Stadium for Dodger games and special events at the Dodger Stadium property.

Comment P709-29 This project makes no sense. At max capacity, it can only handle a fraction of the attendance at Dodger Stadium, and how do you think they're getting to the gondola? By driving, most of them. You're only saving the last 1.2 miles. Maybe some will take transit, these are probably the same people who would have taken the Dodger Stadium Express, which we support. Let's support expanding and electrifying the Dodger Stadium Express, better enforced bus lanes, more bike lanes, better sidewalks, and an escalator up the hill for pedestrians. Not this boondoggle gondola.

It doesn't help traffic.

It doesn't connect us to parks or transit.

Those are lies.

Response P709-29 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. The underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. Refer to Response P709-25 for discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express and the Pedestrian Enhancement Alternative. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities,

including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P709-30 What it does is turn Chinatown into Dodger Stadium's parking lot. It takes away parking for businesses, it increases noise with this gondola running constantly, 18 hours per day, 6am to 12am. Not to mention the invasion of privacy.

Response P709-30 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. Refer to Response P709-7 regarding privacy.

Comment P709-31 This gondola mows down the entrance of LA State Historic Park. That's OUR space. The whole point of a park in a city is for people who live in a dense urban environment, to get away from all that and to have some peaceful enjoyment in open space with

open skies. It wasn't so that Frank McCourt could fly 5-ton metal cabins 26 ft over our heads.

Response P709-31 Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Furthermore, ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P709-32 McCourt wanted to divide us in my neighborhood, buy us out, buy some of my neighbors out, so that we would quietly go away. He wanted to fly under the radar with this project, keep everything hush hush, and get the project approved before anyone knew what was going on. In 2018, they said it could be running by 2022. Remember that?

Response P709-32 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response P709-4 for discussion of outreach and community engagement during the Draft EIR scoping period and the Draft EIR public review period.

Comment P709-33 My neighbors and I never even had a say about this project going over our neighborhood. And now Climate Resolve is putting their greenwashing slime all over it? It's disgusting!

Response P709-33 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P709-32 for discussion of the Project Sponsor.

Comment P709-34 You'll hear some people say, "but the gondola will be so great, it will be iconic." Yeah, it'll be iconic alright. An iconic monument to injustice.

We're here to call it for what it is. A scam. And a shame. If you're standing up and supporting this, you need to wake up. You're teaming up with Frank McCourt who bankrupted the Dodgers. You're teaming up with those who erased the original Chinatown, and evicted the residents of La Loma, Bishop and Palo Verde to build Dodger Stadium. You're choosing that side of history. And you really don't have to.

We're speaking out because we know the gondola sounds good at first, in theory — it's like, oh it would be so cool and fun — but there's a whole lot more to it. Some people, I think a lot of people, the ones who aren't greedy bastards, do come around. But we need everyone's help, so thank you for being here. We can do this together. Stop The Gondola!

Thank you.

Sincerely,

Phyllis Ling

Response P709-34 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P710 - Phyllis Ling #3

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P710

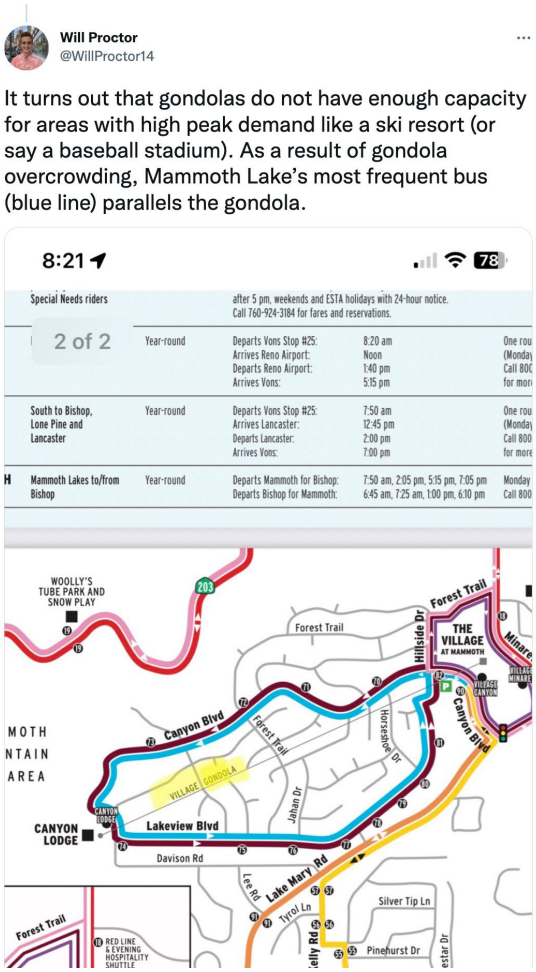
Comment P710-1 Dear Mr. Zelmer

Please include the following attachment as comments for the LA ART Project DEIR.

Sincerely,
Phyllis Ling

Response P710-1 This comment provides a general introduction to the comments raised in this letter. This comment letter appears to copy and paste tweets from Twitter. These tweets are general commentary on the proposed Project, many of which were not submitted by the original author, and do not provide substantive comments on the Draft EIR warranting a further response. Nevertheless, responses to the comments contained in this letter are provided in Responses P710-2 through P710-6.

Comment P710-2



Response P710-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. The gondola from The Village in Mammoth Lakes to the Mammoth Mountain Ski Area was not intended to provide sufficient capacity to be the sole method of transportation to the ski area. It is one of three modes that are available to obtain access to the ski area: driving, the Mammoth Lake's bus system, and the gondola. In fact, the gondola is the most recent of these modes to be provided and supplements the other two modes. Similarly, the proposed Project would not be the only mode of transportation to Dodger Stadium and would supplement the other available modes. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions.

Comment P710-3

Response P710-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. As discussed in Topical Response N, Environmental Justice, this would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing associated air pollution and improving safety. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Further, comparable aerial transit systems in other countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment P710-4

Response P710-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and

requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1., Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Response P710-3 regarding the Project Sponsor.

Comment P710-5

Response P710-5 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response 710-4 for a discussion of how, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park would not be affected by the proposed Project.

Comment P710-6

Response P710-6 The comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed on pages 3.04-18 and 3.04-19 of Section 3.04, Biological Resources of the Draft EIR, the proposed Project alignment is not in or near a known avian migratory corridor and lacks habitat and topographic features that would promote concentrated avian migratory activity. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how the risk of avian collisions with the cables or components of the proposed Project is expected to be less than significant. Design features of the proposed Project are likely to reduce the risk of avian collisions in comparison to transmission lines. First, the proposed Project's ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds.

Fourth, the proposed Project would implement BIO-PDF-C. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines. The occurrence of the greater white-fronted goose that landed at Dodger Stadium in October 2022 that was cited as an example of lights attracting migrants is far from definitive. One example is not an indication of a widespread phenomenon. The fact that this greater white-fronted goose case gained nation-wide attention suggests it is not a particularly frequent occurrence. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P711 – Miho Murai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P711

Comment P711-1 Deputy Executive Officer Cory Zelmer,

My name is Miho Murai and I am a Chinatown resident. I am also an At Large Board Member of the Historic Cultural North Neighborhood Council. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("the Gondola Project") at Dodger Stadium. I am submitting this opposition on behalf of myself and not our Neighborhood Council. As a current resident of Chinatown living by the highly congested intersection of College and New Depot, I will be greatly impacted by this project.

Response P711-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses contained in this letter are provided below in Responses P711-2 through P711-5.

Comment P711-2 This is a ridiculous project that does not serve any benefits to our community. Rather, the Gondola Project will increase traffic around Chinatown and Union Station and will displace the traffic from Dodger Stadium and push it into the surrounding communities. The majority of the people who will likely utilize the Gondola will not be residents of Chinatown. Where will they park? As it is, the parking lot at Union Station is often full.

Response P711-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition,

the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to Project features.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P711-3 In addition, the Gondola Project will impact historic and cultural places such as the Los Angeles State Historic Park, the historic Union Station, and El Pueblo de Los Angeles Historic Monument. The projected towers will obstruct views and will diminish the natural beauty of Chinatown and these historical landscapes.

Response P711-3 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources, including to Los Angles State Hisotric Park, LAUS, and El Pueblo, in Section 3.5, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.5, the

Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of the Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment in LU-6, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P711-4 Finally, there has been a lack of transparency in how this project has been developing. For example, Metro went forward with this project without an open public process and without competitive bidding.

Response P711-4 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P711-5 It is unclear who will actually own and operate this project. It is unclear who will be paying for its maintenance. Will these costs fall on taxpayers, such as myself and my neighbors, who are adamantly opposed to this project? The Chinatown community

does not need a tourist attraction but rather we need affordable housing, reliable public transportation, and a grocery store that caters to our elders.

Response P711-5 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P711-6 As an active community member, I ask you to please consider the wishes and needs of our community before you allow this ridiculous project to move forward. Please listen to the voices of the community and give us an opportunity to be meaningfully heard. The Gondola Project does not serve our community in any way. Those who support the project do not live in Chinatown and will not be ones that will be impacted by this project.

Thank you for your time and consideration.

Sincerely,
Miho Murai
Chinatown Resident

Miho Murai
Mihomuraiesq@yahoo.com
852 N. Bunker Hill Avenue

Response P711-6 This comment provides a general conclusion regarding the comments raised in this letter. Responses contained in this letter are provided above in Responses P711-2 through P711-5. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's

outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements, including hardscape and landscape improvements.

Comment Letter P712 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P712

Comment P712-1 Dear Mr. Zelmer,

I am OPPOSED to the LA ART Gondola Project.

Please include my comment letter and supporting document in the official file for the DEIR.

Sincerely,

Phyllis Ling

Response P712-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. All comments on the Draft EIR are included in Appendix C, Public Comments on the Draft EIR, and Appendix B, Public Hearing Transcripts, of the Final EIR. Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR. The comment letter referred to in this comment is Comment Letter P709. Refer to Responses P709-1 through P709-34.

Comment Letter P713 – Maria Gritsch and Warren D. TenHouten

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P713

Comment P713-1 We are OPPOSED to the proposed aerial tramway to Dodger Stadium.

Please delete this plan.

Thank you in advance.

Maria Gritsch TenHouten

Warren D. TenHouten

Response P713-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P714 – Christopher Roman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P714

Comment P714-1 To Whom it May Concern:

I am very strongly in favor of this initiative. Innovative projects of this nature are key to encouraging the use of public transportation and reducing the volume of cars on our region's roads.

Response P714-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P714-2 I live in Mozaic Apartments, immediately adjoining the proposed Union Station stop of the tram line. Every home Dodger game, I see a dramatic increase in car and bus traffic (particularly due to the extremely heavily used Dodger Express) around Union Station. Having an aerial tram carry these passengers would lessen the reliance of Dodger fans on traveling by road to the stadium, particularly a road that sees extraordinarily heavy traffic on game days. Even on non-game days, this tram would offer a convenient mode of transit to travel north on Alameda from Union Station to Chinatown and the LA State Historic Park area.

Response P714-2 Refer to Response P714-1 for discussion of the purpose and need for the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed

Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P714-3 Additionally, I think this development would be a positive one for this area, as it would be a major draw for tourists and an instant city landmark. It would bring more foot traffic and attention to historic Olvera Street and Union Station. Riding the tram would also be a fun leisure activity, offering fantastic views of the LA State Historic Park and the downtown skyline even on non-game days.

This is a unique and exciting opportunity, one that any world-class city should jump to embrace. I hope to see this project approved and constructed. Thank you.

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Christopher Roman

Response P714-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown and at El Pueblo.

Comment Letter P715 – Xochitl Manzanilla

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P715

Comment P715-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P715-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P715-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P715-2 Refer to Response P715-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P715-3 for discussion of the opportunities for public participation during the Draft EIR Public review period.

Comment P715-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P715-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P715-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Xochitl Manzanilla

Response P715-4 Refer to Response P715-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P715-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P716 – Tany Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P716

Comment P716-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P716-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P716-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P716-2 Refer to Response P716-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P716-3 for discussion of the opportunities for public participation during the Draft EIR Public review period.

Comment P716-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P716-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P716-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Tany Ling

Response P716-4 Refer to Response P716-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P716-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P717 – Alex Ward

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P717

Comment P717-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P717-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P717-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P717-2 Refer to Response P717-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P717-3 for discussion of the opportunities for public participation during the Draft EIR public review period.

Comment P717-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P717-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P717-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Alex Ward

Response P717-4 Refer to Response P717-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P717-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P718

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Comment Letter P719

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Comment Letter P720

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Comment Letter P721

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Comment Letter P729

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Comment Letter P730 – Charles Robinson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P730

Comment P730-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I have lived in Los Angeles my entire life, and I have used public transport my entire life. The Gondola project wastes money and resources that could go towards increasing affordable, reliable public transit for Angelinos.

Response P730-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter P731 – Manohla Dargis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P731

Comment P731-1 I am writing to express my vehement opposition to the Los Angeles Aerial Rapid Transit Project a.k.a. Frank McCourt's preposterous and outrageous gondola project.

Response P731-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P731-2 It is unimaginable that this rich man's folly would have gotten this far if it had been proposed for a wealthy neighborhood like Bel Air – it would have been shut down *immediately*. The objections from community members and many others to this undemocratic proposal are informed and persuasive.

Response P731-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P731-3 This project is terrible for people, terrible for the environment and terrible for the City of Los Angeles.

Response P731-3 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project feature. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the

intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment P731-4 As Kathleen Johnson, the executive director of Los Angeles River State Park Partners, recently wrote in a letter that was published in The Los Angeles Times <https://www.latimes.com/opinion/letters-to-the-editor/story/2023-01-12/frank-mccourts-dodger-stadium-gondola>:

"Metro's opaque deal with former Dodgers owner Frank McCourt to build a gondola to Dodger Stadium through LA State Historic Park would severely compromise people's experience of the park, a taxpayer-funded green space that the area's historically underserved residents fought for decades to establish.

"The gondola would take public park land, destroy 81 mature trees, permanently alter the park's thoughtfully designed vistas, jeopardize park event revenues and vital maintenance, and threaten the park's significant historic features.

"These impacts on the park would be an environmental injustice. LA State Historic Park was born from an outpouring of community activism that transformed a rail yard into a green urban oasis, with al of the related health and community benefits. It is well used by residents, neighbors and visitors from throughout the city and has also become a vital, climate-resilient native landscape supporting local wildlife.

"After this long-fought struggle, people deserve to have their original designs and uses for the park respected and their public land protected.

"A project such as this would never be proposed over New York's Central Park, so why should the residents of Northeast L.A. be subjected to it?

Response P731-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic

Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment P731-5 I also echo the concerns voiced in another letter to the Times <https://www.latimes.com/opinion/letters-to-the-editor/story/2023-01-12/frank-mccourts-dodger-stadium-gondola>, this one from Jon Christensen, an adjust assistant professor at UCLA's Institute of the Environment and Sustainability:

"A study conducted by my colleagues at the UCLA Mobility Lab <https://uploads-ssl.webflow.com/61c3996ce146bfa8fc27adeb/635c2657c071e02577a5c5a0_Report%20on%20UCLA%20study%20of%20gondola%20traffic%20impact%20102522%20.pdf> found that the gondola will not reduce traffic significantly on the streets and highways around Dodger Stadium on game days and, therefore, will not reduce greenhouse gas emissions.

"Furthermore, McCourt has not donated the project to Climate Resolve, according to county counsel. So why is Climate Resolve shilling for the project, while McCourt remains silent about his end game, a massive entertainment complex on the Dodger Stadium parking lots, which he has long touted?

"This is greenwashing, pure and simple. We have better solutions. The existing Dodger Stadium Express from L.A. Union Station is 19 times more energy efficient than the gondola would be per passenger trip. An individual electric vehicle is eight times more efficient."

Response P731-5 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Comment Letter P732 – Justin Dickerson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P732

Comment P732-1 I oppose the proposed aerial gondola system between Union Station and Dodger Stadium called LA ART.

Response P732-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P732-2 As background, I live in Studio City, which has become a designated sacrifice community for the commercial benefit of Van Nuys Airport (VNY) and Burbank Airport (BUR).

Response P732-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P732-3 I do not live near either airport, and there were not overflights here until the FAA implemented its NextGen airspace modernization program. FAA NextGen (1) concentrated what had been for decades a 6-mile wide dispersed departure path, (2) moved it 3 miles to the south, and (3) lowered the altitude for a long, slow ascent. As if this was not enough for a single community to bear from 2 airports, the FAA also layered in eastern arrivals and terrifyingly low wind arrivals.

Studio City now has near-constant low-flying aircraft overhead. The FAA chose Studio City to absorb extreme amounts of noise and pollution from 2 airports, and, worse, did so without any consideration of ground impacts from the FAA's changes. Los Angeles is better than this.

Response P732-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P732-4 *Severe negative impacts for a tourist attraction*

Response P732-4 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems,

3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment P732-5 Given the above, I am all too familiar with what it is like having transportation "progress" added in the airspace that was not there before. Like FAA NextGen at these airports, commercial gain from the aerial gondola (for a private corporation) is being prioritized while ignoring the negative impacts on communities that unfortunately live, work, and go to school below the proposed aerial pathway.

Response P732-5 Refer to Responses P732-4 for a discussion of the proposed Project's potential environmental impacts and P732-10 for a discussion of considerations regarding the surrounding communities. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P732-6 These communities will suffer severe negative impacts including loss of privacy (gondolas will be less than 40 feet above homes!) and cluttered airspace ... for a

tourist attraction. A $120 ride for a family of 4 to Dodger Stadium is not a transportation solution, but merely a gimmick.

Response P732-6 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations, and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P732-7 According to a UCLA Mobility Lab study dated October 24, 2022, LA ART would not significantly reduce traffic around Dodger Stadium, will not reduce greenhouse gas emissions, will carry fewer passengers than LA ART claims, will not likely be used after the games, and will unlikely be used for any transportation aside from the games. There are far better ways to meet the objectives through alternatives, including better use of existing bus lanes.

Response P732-7 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium

via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P732-8 *LA ART similar to City's push for AAM/UAM implementation*

Response P732-8 Refer to Response P732-10 for a discussion of the proposed Project's ability to reduce vehicular travel and improve connectivity in surrounding communities.

Comment P732-9 LA ART is strikingly similar to the city's effort to benefit the aviation industry through the rollout of Advanced Air Mobility/Urban Air Mobility ("AAM/UAM") in Los Angeles.

Response P732-9 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response P732-10 for a discussion of the Project Sponsor.

Comment P732-10 Similar to the gondolas, the AAM/UAM "flying taxis" will hold 2-4 people, fly at low altitude (350 ft AGL), serve only high-income users, and will not reduce freeway traffic. AAM/UAM has been pushed forward at breakneck speed behind-the-scenes without any meaningful community engagement or community input. All while the public is left in the dark on what additional burdens are to come, for the sake of private economic benefit, to those under a flight path or a gondola track.

Response P732-10 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Section 2.0, Project Description, for discussion of how the proposed Project would comply with the American National Standards Institute (ANSI) Standard B77.1 governing aerial clearance. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the

Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment P732-11 Please stop ignoring severe human and environmental costs for monetary gain of private corporations. Include citizens in the process and take their concerns to heart.

Response P732-11 Refer to Response 732-4 for a discussion of the proposed Project's environmental impacts. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes the alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential

partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P732-12 Most importantly, *stop LA ART and stop AAM/UAM*. Neither is an actual transportation solution, but both are nightmares for communities and natural spaces beneath them.

Response P732-12 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Response P732-4 for discussion of how the proposed Project would have less than significant operational impacts.

Comment Letter P733 – Sara Feldman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P733

Comment P733-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I no longer live in Los Angeles, but from 2001 to 2013 I was the Vice President for Programs at the California State Park Foundation. In that capacity, I work tirelessly with California State Parks on the development of this important, groundbreaking, innovative public park. I watched it grow from a brownfield to a cornfield, to a green park filled with stunning views, beautiful trees, historic interpretation and spaces of all sorts for the community to gather and participate in a wide variety of activities.

I write now as a private citizen, but my time at the Foundation afforded me a deep inside into the value of this unique park.

Response P733-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park.

Comment P733-2 The Gondola Project's enormous towers will cause aesthetic impacts in the community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P733-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct

structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included as Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local art collaborators. Further, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the proposed Project's system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P733-3 The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P733-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P733-4 The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace heavy traffic from Dodger Stadium and push it onto the surrounding communities.

Response P733-4 Refer to Response P733-3 for discussion of how traffic is not required to be analyzed in the Draft EIR under CEQA.

Comment P733-5 This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P733-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gas emissions directly in the proposed Project's corridor as defined within the EIR over the useful life of the proposed Project, and without using offsets the proposed Project's lifetime VMT reduction over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under SB 44.

Comment P733-6 This project will lead to displacement and increase the cost of rent in the area, and will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P733-6 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process.

Comment P733-7 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden.

Response P733-7 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P733-8 Who is paying for this project? Will taxpayers be left holding the bag? This is the absolute opposite of what happened with the development of the park, which involved extensive community consultation and was very transparent.

Response P733-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public

outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P733-9 I strongly urge Metro to view this proposal with a very critical eye and remember the community that fought so hard for this park, which has become a symbol of innovation and beauty far beyond just downtown.

Response P733-9 Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the Park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment Letter P734 – Echo Park Neighborhood Council

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P734

Comment P734-1 On behalf of the Echo Park Neighborhood Council (EPNC), I would like to submit a comment in response to the Draft Environmental Impact Report (EIR) published by AECOM for LA Metro. The Echo Park Neighborhood Council would like to highlight and echo some concerns already raised by the residents of Echo Park, our neighbors and community partners regarding the environmental and cultural impacts of the proposed project.

Response P734-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P734-2 through P734-8.

Comment P734-2 I. Response to Claim of Reduced Traffic Congestion

LA ART is proposing that the new gondola transit system would help to alleviate the traffic caused by the popular games at Dodger Stadium. While traffic congestion and pedestrian safety is a major concern for local residents, the free bus system from Union Station to the Stadium already offers an alternative to driving to the games. In fact, UCLA published an independent study that claimed the gondola system would actually do little to reduce the traffic congestion in and around the stadium. EPNC is concerned that instead of diverting the 3,000 drivers LA ART claims it will divert in its report, the gondola will instead divert less drivers and actually divert users of the free shuttle system.

Response P734-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. As discussed in Topical Response O, the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel

time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P734-3 Furthermore, LA ART has not discussed any parking plans to accommodate these 3,000 drivers at either of the transit stations at Union Square or Chinatown Gold Line station. EPNC is concerned that with increased traffic and street parking in these areas, pedestrian and cyclist safety will be at risk. LA ART also has not proposed additional safety measures to address this concern.

Response P734-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations..

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Refer to Topical Response C, Project Features, for discussion of the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment P734-4 EPNC would like to see further studies on this subject and would like LA ART to incorporate more pedestrian + bike friendly additions to the project to truly alleviate

traffic in our neighborhood. LA ART has already suggested building a pedestrian bridge to connect Broadway to LA Historic Park as a part of its contribution to the neighborhood.

Response P734-4 The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access on the west would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo in an area currently used as a parking and loading area for El Pueblo. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. To facilitate transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating. Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. The proposed Project would also provide support for the future Los Angeles State Historic Park bike and pedestrian bridge. Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. In addition, the cabins would accommodate bicycles and would be fully ADA accessible.

Comment P734-5 LA ART could also help to install more public escalators and walkways to make walking to the stadium from the LA Historic/Chinatown area more feasible. With the Project in its present form, EPNC is not convinced that there is in fact a significant benefit to our community as it relates to traffic congestion.

Response P734-5 Refer to Response P734-4 for discussion of the pedestrian improvements included as part of the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions.

Comment P734-6 II. In Response to Adverse Community Impacts

Our neighbors in Chinatown have raised concerns over noise pollution, privacy and risk of gentrification that would come with the construction of this transit system. Chinatown is already a community that has faced issues of gentrification due to outside investment and subsequent displacement of local residents and businesses. At present, there are no protections for Chinatown residents and legacy businesses that would ensure their survival in the community. EPNC would like to see LA ART do more to ensure the survival of legacy businesses in Chinatown should the project move forward. A suggestion would be to place a Chinatown non-profit as the lease holder for the concession stands planned for the station so that priority can be given

to a local legacy business. Cost to ride the gondola for community members should also be free at all times.

Response P734-6 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships

with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. In addition, refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P734-7 EPNC would also like to echo that LA ART should do more to invest in the local communities that they are crossing into, and make the addition of shade structures, benches, trees and sidewalk improvements a permanent and 100% assured addition to the project and neighborhood in Chinatown. EPNC also supports the addition of the pedestrian walkway from Broadway to LA Historic Park and the placement of bike ride share stations at each transit station.

Response P734-7 Refer to Response P734-4 for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access on the west would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo in an area currently

used as a parking and loading area for El Pueblo. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. To facilitate transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating. Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. The proposed Project would also provide support for the future Los Angeles State Historic Park bike and pedestrian bridge. Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. The proposed Project would also provide a mobility hub at Dodger stadium Station where outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. In addition, the cabins would accommodate bicycles and would be fully ADA accessible.

Comment P734-8 In conclusion, the proposed project in its present form, does not provide a substantial enough benefit to the community or surrounding environment for EPNC to support. LA ART would need to meet all of its suggested improvements and much more in order for the community to feel like it was a positive addition to our neighborhoods.

Response P734-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P734-9 RESOLUTION

On January 24, 2023, the EPNC Board of Governors held a Brown Act noticed-meeting, at 7pm through zoom. With a quorum of 15 board members present and vote count of 15 yeas, 0 nays, and 0 abstentions, the Board resolved to write a request for action for the application as set forth above.

Response P734-9 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P734-2 through P734-8.

Comment Letter P735 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P735

Comment P735-1

Dear Ms. Wiggins,

Attached are the comments to Mr. Zelmer concerning the LAART "Gondola" project and particularly the meeting hosted by him at Cathedral High School on January 12, 2023. As a result of the meeting, the Los Angeles Union Station's Board of Directors is calling for the reschedule of the meeting because of the complete disarray of the 1/12/23 event and the lack of Disabled Parking which made it unreasonably difficult for people such as myself. We also believe that Mr. Zelmer failed terribly in the execution of his duty hosting the very important and public meeting and request that he be reassigned away from the "Gondola" project.

Response P735-1 This comment provides a general summary of the comments raised in Comments P736-2 through P736-5. Refer to Responses P736-2 through P736-5. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023, public hearing. Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Cathedral High School has at least five accessible parking spaces within the school campus, including within on campus parking lots accessible from Bishops Road, North Broadway and Cottage Home Road. The lots that these spaces are in were available to attendees during the January 12, 2023, public hearing.

Comment Letter P736 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P736

Comment P736-1 I was present at the recent LAART Gondola meeting hosted by you, and/or LA Metro, Frank McCourt, Los Angeles Aerial Rapid Transit, ClimateResolve, Cathedral High School and Does 1 to 10. I attended as the representative of the Los Angeles Union Station Historical Society (LAUSHS). Here are my recollections that in our opinion brings into question the legitimacy of the meeting:

Response P736-1 This comment provides a general introduction to the comments raised in the letter. Responses to the comments contained in this letter are provided below in Responses P736-2 through P736--5.

Comment P736-2 A) Although I arrived at Cathedral High School meeting venue at the beginning of the meeting, I was delayed by thirty minutes getting to the venue because there was no Disabled Parking in or around Cathedral High School. (This has since been confirmed by Cathedral High School staff.) Consequently, I was late because I am a Disabled Person, and since all normal street parking was occupied by residents and/or meeting participants, I was obliged to park on the sidewalk after driving about for nearly 30 minutes, in fear of not representing the views of the LAUSHS. Consequently, I waddled with cane in hand to the distance to the meeting. This, in our opinion, a reasonable person would conclude that Mr. Zelmer and/or other "hosts" do not care about providing reasonable accommodations for Disabled Persons and myself. Furthermore, it indicates to us Mr. Zelmer's indifference to the Disabled and/or his incompetence in hosting same at the public meeting.

Response P736-2 Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Cathedral High School has at least five accessible parking spaces within the school campus, including within on campus parking lots accessible from Bishops Road, North Broadway and Cottage Home Road. The lots that these spaces are in were available to attendees during the January 12, 2023, public hearing. Refer to Response P736-3 for discussion of the January 12, 2023, public hearing.

Comment P736-3 B) When I finally entered the meeting, it had the appearance and sound of a near riot. I was told by bystanders that the spontaneous demonstration was because Mr. Zelmer and other hosts refused to take any questions of the 70 to 100 members of the local community in attendance. It is our opinion that a reasonable person might conclude that Mr. Zelmer is incompetent in representing Metro, and LAART in a public forum.

Response P736-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR.[43] After the protesters left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023

[43] LA Aerial Rapid Transit Technologies LLC. 2023. Memorandum Regarding LA ART Draft EIR Public Hearing No. 3 – Consultant Experiences During Protest.

public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment P736-4 C) Furthermore, the working press and Community representatives said that they were told to ask Brother John Montgomery, Principal of Cathedral High School for answers to their questions on LAART. Brother John is not to our knowledge a credentialed transit or environmental expert. (All known nonaligned experts and the Sierra Club are against the Gondola.) Brother John then extolled to them via nation-wide TV, the reasons he saw for building the Gondola, without mentioning the pertinent fact that his employer, Cathedral High School, gets significant funds from Frank McCourt, an apparent conflict of interest in our opinion.

Response P736-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023, public hearing held along the proposed Project alignment at Cathedral High School. The format of the January 12, 2023, public hearing was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the Cathedral High School Gymnasium, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. Neither Metro nor the Project Sponsor directed attendees to direct questions about the proposed Project to Cathedral High School staff, and meeting staff at the Welcome Table provided attendees with roadmaps for the stations around the gymnasium. Refer to Response P736-3 for discussion of the public comment opportunity at the January 12, 2023, public hearing. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P736-5 D) Therefore, the Los Angeles Union Station Historical Society has concluded that given all the above, the legal validity of the meeting was compromised and that a new meeting should be rescheduled with a live democratic give-and-take on the issues, better crowd control and hosted by an uncompromised Metro meeting expert, not Mr. Zelmer who a reasonable person might conclude is compromised by an apparent conflict of interest in that he is a Metro employee in charge of investigating the Gondola project for the public weal whilst his salary is gifted to Metro by the Gondola's chief proponent and benefactor Frank McCourt.

Response P736-5 Refer to Responses P736 2 through P736-4 for discussion of the January 12, 2023, public hearing for the proposed Project's Draft EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of how, in light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. Certain attendees who expressed concerns about the proposed Project nonetheless shared positive feedback with Metro for the facilitation of this public hearing, including thanking Metro for the "calm, collected, and objective facilitation of this hearing this evening," "inviting a Toisan interpreter and obliging access needs in the meeting," and "continuing this meeting past the time . . . to hear so many of my neighbors views." An estimated 168 attendees participated in the February 8, 2023, continued public hearing, and Metro received 82 verbal comments on the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As is customary, the Project Sponsor is reimbursing Metro for its time on the proposed Project as the Lead Agency under CEQA.

Comment Letter P737 – Karina Macias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P737

Comment P737-1 Hope you are doing well. Good to see Metro is hosting this public hearing to continue accepting comments after proceedings at Cathedral High were disrupted.

I am following up in hope that you can help me get more information about this virtual hearing's format. Specifically, what measures will the project team be implementing to ensure that the "continued" public hearing format:

- allows all participants to record their comment(s) and their affiliation (e.g., project area resident, CBO, etc.)
- supports multi-language informational presentation and comment recording, and
- provides interested participants without access to a computer can participate.

Thanks so much in advance for your help!

Response P737-1 In response to this inquiry, Metro responded on February 1, 2023, providing the requested information.[44] Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023 public hearing. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. Project materials and information were provided on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). The continued public hearing offered Spanish, Cantonese, Mandarin, and Taishanese interpretation through Zoom's interpretation function. Public comments made in Spanish, Cantonese, Mandarin, or Taishanese were translated to English, and court reporters

[44] Email from Cory Zelmer to Holly Rockwell, re: FW: Los Angeles Aerial Rapid Transit – NEW VIRTUAL PUBLIC HEARING 2/8/23 (February 1, 2023).

recorded the English translation. Slides contained identical, side-by-side information in English, Spanish, Chinese (Simplified) and Chinese (Traditional).

Comment Letter P738 – Zab Steenwyk

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P738

Comment P738-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Let me start by saying I am a resident who lives in an apartment building across from LA State Historic Park and one of the reasons we chose the neighborhood was the proximity to public transportation. I take Metrolink trains from Union Station to work, my husband bikes to his work downtown and we've jumped on the Metro lines to get around more than once. We are BIG supporters of more public transportation in the city.

Response P738-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P738-2 So when I saw the Stop the Gondola billboards, I was a little confused. More public transportation? What wasn't to like? It was only after investigating the positive and negative impacts that the gondola was projected to have as reported in the Environmental Impact Report (led by LSCMTA) that I realized the negatives far outweigh the positives.

Response P738-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P738-3 through P738-6.

Comment P738-3 First of all, the budget is exorbitant for an extremely limited service route. As a train user, I've seen Union Station on game days and know that it's not THE main artery that fans are using to get to Chinatown/Echo Park. Rather that budget could be put towards adding additional free game-day shuttles from the neighborhoods surrounding Elysian (like Silver Lake, Los Feliz, Koreatown, Downtown, Lincoln Heights and more) which would allow exponentially more residents safe, sustainable and easy transport to the stadium.

Response P738-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed

Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone attending a game or event at Dodger Stadium.

Comment P738-4 As a nearby resident, I also know that there are only 81 home games per season - 25% of the year. My husband and I walk in the park nearly every day. The open views and beautiful landscaping and trees are a welcome respite from our otherwise busy city. We love the hill near the entrance where dog owners gather - it makes it feel like a community and fosters interactions between neighbors. Our favorite view is when we turn around at the end of the park and downtown is perfectly framed. The scale of these gondola towers, the proximity of the cabins to the ground, and the eyesore of the building would ruin the solace we and many others find in the park. It's not worth ruining 100% of the days in the park for a few rush hours on the 25% of days where a game is being played.

Response P738-4 Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the

proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The proposed Project would also enhance the public realm, aesthetic lighting/signage, connections to open space, transit, and community facilities. As such, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the impact would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

Comment P738-5 The estimated emissions saved by the gondola are minimal and can not begin to compare to the emissions saved offering free or low-cost shuttles - LARGELY due to the fact most fans would still have to drive to the stations since there will be so few. This neighborhood is already burdened by emissions from being surrounded by highways in all directions. There are real ways to reduce this and I'd like to see our public officials champion those kinds of real changes - not be resistant to public comment like this process has been.

Response P738-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions,

and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system at LAUS. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. In addition, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P738-6 Again - I'm a big public transportation fan. But there are infinitely better ways of achieving this than the Gondola and I hope you will explore them instead of burdening this community with a developer's misguided project.

Response P738-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. Improving the connection between LAUS and Dodger Stadium via the proposed

Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter P739 – Robert Cole

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P739

Comment P739-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This project will negatively impact the local community. There has not been any consideration on the local residents in the area. The community does not want this gondola flying over it all day and night. Take the bus!

Response P739-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union

Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter P740 – Mara Fisher

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P740

Comment P740-1 I'm writing in support of the Los Angeles Conservancy's comments calling for an environmental review of LA ART led by the City of LA and also in opposing this project.

Please find the Conservancy's full comments here.

Thank you for your time.

Response P740-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with the City as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Refer to Response GO16 for responses to the Los Angeles Conservancy's comment letter referenced in this comment..

Comment Letter P741 – Sara Clendening

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P741

Comment P741-1 Hi! I don't know if this is the right phone number, but my name is Sara Clendening, President of Lincoln Heights Neighborhood Council, speaking as an individual in reference to the Gondola project. And I guess this will be my public comment for the record, and that our community, Lincoln Heights, is opposed to the Gondola, as is the historic community of Dogtown, and Solano, and Chinatown. The public private partnership on, you know, public property, that was given away to a corporation—which, that issue was never… we've never seen justice from that—with the three communities of La Loma, Palo Verde and Bishop, getting their land taken, right? Dodgers shouldn't, shouldn't… you know, we can't move forward with the Gondola until, like, that has been dealt with, right? Like, in the terms of, like, land back or reparations, and justice for our community. Now, the Gondola thing. Yeah, no. It can't go anywhere. Taxpayer money should not be going to benefit an evil corporation that, you know, basically destroyed a mountainside with the help of this city, and eradicated the communities. And that is that. And we are absolutely opposed to this Gondola.

Response P741-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These

vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P741-2 Although, we do appreciate the EIR that metro did with the archeological stuff. Good work on that.

Response P741-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P741-3 But yeah, there's no way that you guys should be working with the Dodgers on this. Right. Bye.

Response P741-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P742 – Dennis Rohatyn

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P742

Comment P742-1 Hey, hello my name is Dennis Rohatyn. I'm interested in the aerial rapid transit project, the so-called Gondola, and I plan to attend the Zoom meeting in a few days. And I'm looking over the report, and the only thing I don't see is the height at which the Gondola is going to fly, or the arch, the trajectory, and what the maximum height will be. Nothing in the description tells me that. I'm wondering if you know that, or can refer me to someone who does, or if there is a diagram or something of that sort that will let me know what that altitude will be for some, if not most, of the 7-minute flight. My name again is Dennis Rohatyn, R-O-H-A-T-Y-N. My number is 619-318-5373. 619-318-5373, and if it's more convenient, you can always send me an email at "drohatyn", D-R-O-H-A-T-Y-N, at cloud dot com [d.rohatyn@cloud.com]. Thank you so much for your time and help! Bye, bye.

Response P742-1 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the proposed Project components size and height, including Table 2-2: Proposed Project Station and Junction Details and Table 2-3: Proposed Project Tower Details, which provide information regarding the size and height of the proposed Project stations, junction, and towers. Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how the Proposed Alignment Plan and Profile (Appendix Q) includes additional detail as to proposed Project alignment and profile. Refer to Appendix Q, Proposed Alignment Plan and Profile, which includes the proposed Project profile. Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how the proposed Project would meet and anticipates exceeding the American National Standards Institute (ANSI) B77.1 requirements for vertical clearances.

Comment Letter P743 – Douglas P. Carstens, The California Endowment (TCE)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P743

Comment P743-1 On behalf of The California Endowment ("TCE") and pursuant to the continuation of public comment through the February 8, 2023 public hearing scheduled by Metro, on the Draft Environmental Impact Report ("DEIR") prepared for the Gondola project ("Project") proposed by Los Angeles Aerial Rapid Transit ("ARTT"), we respectfully submit the attached material and supplemental comments as our written testimony for this public hearing.

Response P743-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P743-2 through P743-9.

Comment P743-2 This material underscores the feasibility and reasonableness of choosing the environmentally superior, no-emission alternative, with electric buses operated by Metro. The DEIR claims the Transportation System Management ("TSM") alternative "would generate new emissions as there would be additional Union Station DSE (Dodger Stadium Express) bus service on the existing route." (DEIR, p. 4-65.) However, if the DSE buses were all electric, there would be no emissions at all- zero emissions.

Response P743-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

Comment P743-3 The DEIR fails to mention that Metro has received a $104 million grant for zero emission electric buses as was reported on August 19, 2022 (Enclosure 1) and has committed to having an all-electric bus fleet by 2030 (Enclosure 4). Therefore, claiming the TSM alternative would increase emissions is misleading and fails to present Metro's own plan for zero-emission buses.

Response P743-3 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030

to 2035. While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that "the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues." Further, unlike the proposed Project, which, as discussed in Section 3.08, Greenhouse Gas Emissions, of the Draft EIR, has pledged to purchase power required for operations from the LADWP Green Power Program, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid's ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Refer also to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P743-4 This is a substantial and fatal flaw in the current DEIR analysis. It falsely portrays Mr. McCourt's Gondola Project as superior to a low- or no-emission option. Such conclusion in the DEIR is not supported by substantial evidence and creates an erroneous comparison to zero-emission buses. The DEIR should be re-written and recirculated as required by law to provide an accurate and thorough analysis based on substantial evidence of the TSM Alternative.

Response P743-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit

connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Response P743-3 for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, and how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P743-5 Additionally, construction of towers on Alameda Street on public land for Mr. McCourt's private project will be problematic when those parcels are better used for public-serving purposes such as affordable housing with supportive tenant services. Prior to the publication of the DEIR, the City, which is a responsible agency, designated these parcels for desperately needed housing and entered into negotiations to allow for the construction of affordable residential units to house vulnerable populations.[1] The DEIR fails to inform the public of this conflict with City of Los Angeles policies and plans and fails analyze how this impact is to be mitigated.

Footnote 1: The City of Los Angeles' Chief Administrative Officer's Comment letter dated January 17, 2023 stated "The plan for these sites includes D transitional housing and affordable housing with supportive services, and a community center. Because of these facts, the City does not intend to divest itself of these parcels for any use besides providing affordable housing."

Response P743-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. As discussed in Topical Response E, the proposed Alpine Tower is sited on 901 North Main Street and the Homeboy Industries' anticipated housing project is located on 903 North Main Street. The City of Los Angeles is currently in the process of transferring the City owned property at 901 and 903 North Main Street to Friends of Homeboy, LLC, on behalf of Homeboy Industries, pursuant to the City's Affordable Housing Opportunity Site program utilizing City owned properties that have been designated as surplus under the Surplus Land Act. The proposed Alpine Tower is located on a triangular portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and

Alpine Streets, this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing. Based on publicly available information there is no housing proposed for this specific location, which is west of the Metro L Line (Gold) tracks on 901 North Main Street. The area east of the Metro L Line (Gold) tracks on 901 North Main Street would not be impacted by the proposed Alpine Tower. Further, as discussed in Topical Response E, the proposed development Project at 903 North Main Street was considered a related project in the Draft EIR and, as discussed on page 2-22 in Section 2.0, Project Description, of the Draft EIR, "[i]n the process of selecting tower locations, the proposed Project . . . considers the proposed Project's relationship to existing adjacent and potential future land uses." The Draft EIR fully analyzed the potential environmental impacts of placing the Alpine Tower in this location, recognizing the anticipated Homeboy Project as a related project under Section 5.0, Other CEQA Considerations, of the Draft EIR, and as a sensitive receptor for the purposes of the Draft EIR's Air Quality and Noise and Vibration analysis, presented in Sections 3.03 and 3.13, respectively. No further action is required. Further, as discussed in Topical Response E, the proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces, nor would the proposed Project impede The California Endowment's anticipated housing, community and health services, or recreational spaces. Refer to Responses L2-1 through L2-3 for responses to the City of Los Angeles' Chief Administrative Officer's comment letter referenced in Footnote 1 to this comment.

Comment P743-6 While the DEIR discusses Option B- a design option (not an alternative) which would eliminate the Alpine Tower but require the Alameda Tower to be taller, it states Option B has "potential technical constraints due to the taller tower that approaches the limits of technical feasibility due to increase angle of bend at the Alameda Tower." (DEIR, p. 6-20.) In other words- a fair inference from this is that a taller version of the Alameda tower approaches the limits of safety- and so would be even less safe than the current design. The DEIR does not explain what "the limits of technical feasibility" are or what it means that a taller tower "approaches" those limits. What are these limits, and what does it mean for the taller tower to approach them? What impact may this likely riskier option have on the communities below the tower?

Response P743-6 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the proposed Project alignment as the preferred alignment because it best accommodates various technical and design objectives and considerations. Technical considerations of tower locations included optimizing the height of the towers, minimizing the number of towers, and limiting the bend on the towers to less than two degrees. As discussed in Section 6.0, Design and Use Options, with clarifying revisions provided in Section 5.0, Corrections and Additions, to this Final EIR, the Alameda Tower under Design Option B would potentially result in additional technical considerations due to the increased angle of bend at the Alameda Tower compared

to the proposed Project. The Draft EIR's reference to the "limits of technical feasibility" pertained to the more limited number of comparable aerial transit systems with similar bends to Design Option B, not due to the height of the tower or safety considerations. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." The Alameda Tower under Design Option B would be required to meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety.

Comment P743-7 CEQA mandates disclosure of this technical evidence and is necessary to allow for informed public participation regarding the merits of the project and its alternatives. As the attached correspondence from the City indicates, the construction of the Alpine Tower is infeasible and should never have been considered given the timing of negotiations that precede the publication of the DEIR. (See Enclosure 5.) Option A was never a viable approach to construction and other options should have been analyzed instead.

Response P743-7 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 6.0, Design and Use Options, of the Draft EIR, for discussion of Design Option A. Refer to Response P743-5 for a discussion of the Alpine Tower's siting and responses to the City of Los Angeles' Chief Administrative Officer's comment letter provided in Enclosure 5 to this comment letter.

Comment P743-8 Furthermore, a single tower design is both a visual blight and a structural danger given the weight involved and the fact that it crosses two points of a Metro railway line. In the event of an earthquake, as Southern California is prone to and as the recent very large one in the Turkey-Syria border region demonstrates, there is a risk that the entire structure could collapse leading to mass casualty and destruction. (See https://www.latimes.com/california/story/2023-02-06/earthguake-like-turkeys-

would-devastate-southern-california.) Who will be responsible for addressing and mitigating this risk?

Response P743-8 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including seismic ground shaking, upon implementation of Mitigation Measure GEO-A. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety."

Comment P743-9 The many failures presented above render the DEIR inadequate and indefensible. It cannot be presented for consideration by the Metro Board. At minimum, the entire process should be corrected, the appropriate lead agency identified, a thorough and not misleading analysis of the Project and its impacts provided, and the entire process started over with a sufficiently informative DEIR. Thank you for your consideration of these materials in support of our public testimony.

Response P743-9 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P743-1 through P743-8. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental

impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P744 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P744

Comment P744-1 Given today's loom meeting for comments concerning LAART's "Gondola" DEIR the Board of Directors of the Los Angeles Union Station Historical Society (LAUSHS Board) has directed me to send the followings additional and updated comments opposing the LAART "Gondola" DEIR.

Response P744-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P744-2 through P744-15.

Comment P744-2 The LAUSHS Board opposes the "Frank McCourt/LAART /Climate Resolve Gondola" (LAART) private, for profit cable car and real estate development scheme that proposes to link Union Station and Metro's supporting "Esplanade-Forecourt-Fountain" project with Dodger Stadium, because it is contrary to Metro's public duty being a unique special favor for LAART.

Response P744-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment also raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment P744-3 Our Board believes that LAART's proposed futuristic/carnival-like Union Station Alameda Street Terminal and Metro's supporting "Esplanade-Forecourt-Fountain" project will blight the viewscape of the historic and architecturally significant West Facade of Union Station and the greenscape and skyscape of Los Angeles State Historic Park.

Response P744-3 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. While the proposed Project's Alameda Station would be a visible change to the overall setting of the historical resource, as discussed on page 16 of Appendix G,

integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area (i.e., addition of the proposed Project) should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property. As discussed on pages 3.5-49 and 3.5-50 of the Draft EIR, the Los Angeles Union Station Passenger Terminal and Grounds is designated for its architectural and historical significance, and the changes to the resource's setting resulting from the addition of Alameda Station would not impact its architectural significance or its ability to convey this significance. Specifically, as indicated on page 3.5-44, in Section 3.5, Cultural Resources, construction impacts will not alter the physical integrity or character-defining features of the historical resource. Also, as indicated on page 3.5-49, operational features that will have a direct impact on the property and will not alter the physical integrity or character-defining features of the historical resource. Further, visual alterations to the overall setting of the property will be insignificant due to prior substantial alterations to the existing setting and will not impact the significance of the historical resource nor its ability to convey its significance. Overall, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual

unity. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P744-4 Moreover, Union Station, its trains and patrons could be physically harmed if aircraft from the nearby Los Angeles Police Department's "Hooper Memorial Heliport" airport were to be entangled in LAART's overhead cables and 13+ story support towers.

Response P744-4 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. Refer to Response P744-8 for further discussion of Stephen Hooper Heliport.

Comment P744-5 Furthermore, the LAUSHS Board opposes Metro's planned removal of all "Disabled Parking" from the "Esplanade-Forecourt-Fountain" area, without public hearings and reasonable alternatives, to accommodate a new, large "water feature" (a misting water fountain) which would cool LAART patrons cued-up for their cable car rides to Dodger Stadium. The water fountain would be contrary to the state's water conservation policy especially during Los Angeles current and likely permanent, record-breaking draught. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

Response P744-5 Refer to Section 2.0, Project Description, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not remove disabled parking or include a water fountain in the planned LAUS Forecourt, and does not include a water fountain in the planned LAUS Forecourt.

Comment P744-6 The LAUSHS Board had originally chosen not to take sides in the above controversial, billion-dollar real estate development scheme. However, in view of Metro's obvious pro-active role supporting LAART, a potential competitor of its efficient "Dodger Stadium Express" motor coach service, as well as planning to "gild the lily" of Union Station with its Esplanade-Forecourt-Fountain Project, done "backstage," using Metro's without first consulting the public, LAUSHS Board had no choice but to take a firm stand against the various Gondola schemes.

Response P744-6 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons.

The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. While some riders of the Dodger Stadium Express are likely motivated by travelling in more sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles travelled (VMT) to Dodger Stadium than the proposed Project, which would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program. Refer to Response P744-2 for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment P744-7 Among the reasons for The Board's opposition are, but not limited to:

A) Former Metro Board member, then Mayor of Los Angele Eric Garcetti, who originally introduced the motion for Metro to assist LAART without public participation and to enlist Metro staff to "carry LAART's water" as it were, did receive, according to public records, millions of dollars in both political cash contributions and "behest" contributions from billionaire real estate and LAART developer Frank McCourt, his family and various entities which in the LAUSHS Board's opinion, is an unacceptable conflict of interest.

Response P744-7 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P744-8 B) In LAUSHS Board's opinion, Metro Deputy Executive Officer Cory Zelmer and/or subordinates and consultants (Zelmer, etc.) falsified an official environmental document--LAART's Draft Environmental Impact Report (DEIR)—by checking-off the DEIR box that states there is no airport within 2 miles (3520 yards) of LAART's proposed Union Station Terminal, when he had been informed repeatedly to the contrary by the LAUSHS Board. Moreover, The LAUSHS Board presented proof to Zelmer, etc. and Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport" (described as the world's busiest airport for rotary-winged aircraft (aka helicopters) is only 1/2 mile (880 yards) from LAART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer, etc. that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports officially defined as any location where flying machines are serviced. The fact that some airports serve only rotary-winged aircraft (helicopters) while others serve fixed-wing aircraft (conventional aircraft) does not change the fact that all heliports are airports in the eyes of all governing agencies and the Federal Courts. Furthermore, the argument presented by Metro that Hooper Heliport is a police facility, not a civilian facility, and therefore not subject to LAART's DEIR, is illogical and fallacious. It stands to reason that a helicopter that becomes entangled in LAART's cables, gondolas, and 13+story support towers and consequently crashes into Union Station, its trains, and patrons, could cause catastrophic harm regardless had that aircraft

launched from a police facility or a public facility. Simply put, LAART's proposed location is not safe for the Union Station community and helicopters from Hooper Memorial Heliport airport. Please note, the Rules and Regulations of Los Angeles Union Passenger Terminal (LAUS's former name) has for decades stated: "General Notice A. Safety is of the first importance in the discharge of duty."?

Response P744-8 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus, comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment P744-9 C) Contrary to the promises made to the LAUSHS Board by CEO Stephanie Wiggins, Zelmer, etc. and LAART, no meeting has ever been organized between them and the LAUSHS Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LAART's Union Station Terminal. In fact, Metro forbade The LAUSHS Board's examination of the only known 3-D scale model of Union Station's location because of, in LAUSHS Board's opinion, a deliberate subterfuge that the model is dated and furthermore the sharing of the model with the LAUSHS Board would unexplainably be a conflict of interest.

This "shadow play," the LAUSHS Board believes was performed by LA Metro and LAART to obfuscate the issues and delay criticism of LAART. Finally, in December 2022 Metro provided to the general public an aerial diagram of LAART's Union Station Terminal that would be in the worst possible viewscape location--the front of Union Station's historic Hispanic-style West Facade!

Response P744-9 Refer to Response P744-8 for a detailed discussion of Hooper Heliport. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment P744-10 D) In LAUSHS Board's opinion, LAART is designed to compete with Metro's "Dodger Stadium Express," a highly efficient motor coach service that could be environmentally improved if Metro upgraded to modern, environmentally friendly, "green" electric buses that it might funded by using a portion of the $20,000,000 in Federal funds ear-marked for the Esplanade-Forecourt-Fountain project.

Response P744-10 Refer to Response P744-6 for discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project and for discussion regarding the Transportation Systems Management Alternative.

Comment P744-11 E) Additionally, given the seasonal nature of baseball, it is also LAUSHS Board's opinion that LAART is a "Trojan Horse" scheme to facilitate year-around, for-profit retail and real estate development on McCourt controlled Dodger Stadium parking lots and in the adjacent community which would then be subject to "gentrification" forcing the expulsion of working "ethnic minority" families not able to afford dramatically increased rents.

Response P744-11 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N: Environmental Justice for a discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. Specifically, the Draft EIR addressed topics related to environmental justice, including the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution. The Draft EIR also considered and analyzed the proposed Project's consistency with land use policies related to environmental justice.

Comment P744-12 F) Metro's proposed Esplanade-Forecourt-Fountain project, according to Metro employees--who wish to remain anonymous--will be funded by so-called "overlap money" that was "peeled-off" from Metro's defunct LINK-US project that itself was rejected by the LAUSHS Board's and the public's opposition. Moreover, Metro has stated to LAUSHS's Executive Director, via telephone, that ultimately the Esplanade-Forecourt-Fountain project will come to fruition by a two-step process. First, all public

parking including "disabled parking" would be "temporarily" closed in front of Union Station for construction vehicles without public discussion or participation and Step two-well there really won't be a step two because the parking simply will disappear permanently when the construction vehicles depart. The LAUSHS Board believes this conspiracy would be a violation of the Americans with Disabilities Act (ADA). (A disabled motorist has already filed a formal complaint to the Federal authorities against Metro's Esplanade-Forecourt-Fountain project.) Not only would this negatively impact the "disabled" but also the customers of Metro's tenants the Homebound Restaurant and Brewery, TRAXX restaurant and the numerous social and artistic events that take place in the adjacent former "Ticketing Hall." Furthermore, according to a retired Metro staff person, the Esplanade's water fountain will likely attract "homeless" citizens seeking "showers" contrary to Metro's official policy of not catering to the needs of the "homeless." In LAUSHS Board's opinion, Metro's Esplanade-Forecourt-Fountain project is primarily designed to cool future LAART and adjacent Olvera Street tourist attraction visitors during the hot baseball season. (Note: while Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street tourist attraction" per se was invented in 1930 by a real estate development team who went on to develop Los Angeles' "New Chinatown tourist attraction." Ironically, Old Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled there after building the railroad to Los Angeles, then Union Station was built on top of Old Chinatown's rubble.)

Response P744-12 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment P744-13 G) Building the Esplanade-Forecourt-Fountain project's water-feature while semi-desert Los Angeles is experiencing its worst drought yet flies in the face of the State of California's policy to conserve water now and the foreseeable future. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what LAUSHS Board believes is driving LAART and Metro's Esplanade-Forecourt-Fountain schemes-the insatiable greed of billionaire land developers, Metro bureaucratic careerists and Metro's elected officials seeking evermore political contributions!

Response P744-13 Refer to Response P744-12 for discussion of how the proposed Project does not include a water foundation the planned LAUS Forecourt. As described in Section 2.0, Project Description, of the Draft EIR, page 2-49, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment P744-14 H) Finally, the proposed route of Frank McCourt's "Gondola" has it trampling the edges of Los Angeles State Historic Park that was reserved in perpetuity for the public's enjoyment of the open landscape and skyscape that once was a hallmark of

Los Angeles. Consequently, one is forced to ask what part of "in perpetuity" does Frank McCourt and Metro not understand?

Response P744-14 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F: Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Response P744-3 for discussion of how the aesthetic impacts of the proposed Project would be less than significant, including at the Los Angeles State Historic Park.

Comment P744-15 For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society has joined: The Sierra Club, the UCLA Mobility Lab, the LA Parks Alliance, the Aliso Street Historical Society and local community organizations plus others who oppose Frank McCourt's "greenwashing" Gondola scheme.

Response P744-15 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Comments GO12 (Sierra Club) and GO8 and GO14 (LA Parks Alliance) for responses to comments to those commenters. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter P745 – Sunjana Supekar, The California Endowment (TCE)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P745

Comment P745-1 I intend to provide the following comments this evening during the LA Metro Gondola hearing, however, I am concerned that I will not be called on to speak before the 7pm end time. Thus, I would like to submit the following comments.

Good Evening, I am Sunjana Supekar of Chatten-Brown, Carstens and Minteer and on behalf of The California Endowment we wish to express our strong opposition to this unsolicited private tourist attraction representing itself as public transportation. We oppose this project because the community did not ask for it and does not want it—the community wants real public transportation solutions.

Response P745-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. This commenter provided verbal public comment during the public hearing referenced in this comment, in Comment PH218.

Comment P745-2 - The project will not reduce, but actually displace traffic, noise, and pollution from Dodger stadium to already impacted communities in and around Chinatown, disrupting businesses and services and accelerating gentrification.

Response P745-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA

Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through

transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment P745-3 - This private Gondola project will require the use of public land, air space and likely, public resources, to be able to operate.

Response P745-3 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P745-4 - Finally, a superior, no emission, public transportation option already exists by using electric buses to expand the already effective free Dodger Express bus to Dodger stadium.

Response P745-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger

Stadium Express. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game.

Comment P745-5 The Draft EIR presents misleading and incomplete analysis to the detriment of the public who instead of getting information are given an infomercial. We submitted two letters detailing the DEIR's deficiencies, and we urge Metro and its staff to carefully review and consider the points raised in those letters. We are also concerned because the proposed Alameda and Alpine towers are located in an earthquake liquefaction zone.

Response P745-5 Refer to Responses GO17 and PH17 for responses to the letters referred to in this comment. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A.

Comment P745-6 We close by highlighting the numerous other public comment letters from groups, individuals, and public agencies expressing concern about the Project- or opposition to it. These groups include:

Homeboy Industries

Gabrieleno/Tongva San Gabriel Band of Mission Indians.

El Pueblo Park Association

Los Angeles Parks Alliance

California State Park Rangers Association

Natural Resources Defense Council

Sierra Club

Los Angeles Union Station Historical Society

Stop the Gondola, including but not limited to Phyllis Ling

Los Angeles River State Park Partners

Coalition for a Beautiful Los Angeles

State of California/ Natural Resources Agency/ Department of Parks and Recreation *and *the Department of Fish and Wildlife

City of Los Angeles- City Administrative Officer

Los Angeles Conservancy

Land Protection Partners

S&R Partners, LLC, a Riboli Family Company

Trust For Public Land

Latino Outdoors

The extent and breadth of the opposition to, or concern about, this proposed Project is astounding- and should be heard. There are better solutions for Metro and the City of Los Angeles' actual public transportation needs. We ask that you stop this Gondola Project now.

Response P745-6 Refer to Responses GO15, S5, GO8, GO14, P511, P708, GO28, GO13, GO12, GO4, P700, P709, P710, PH24, GO21, GO18, S1, S2, L2, GO16, P701, GO27, and GO22 for responses to the letters referred to in this comment. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P746 – Heather Donnelly

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P746

Comment P746-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P746-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P746-2 Not only is the project going to disrupt neighborhoods left and right, but it will also disrupt the environment which is already sickened with high amounts of pollution. Additionally, if the dodger stadiums former owner wants an aerial gondola going from union station to dodger stadium, they can pay for it themselves and pay a lot in permits and licenses to the city. We need free shuttles, better one-way connections to far away areas and more climate-friendly forms of transportation. Not a $300 million gondola.

Response P746-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans,

and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Comment Letter P747 – Iran Carranza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P747

Comment P747-1 My name is Iran Carranza, a native of Los Angeles for over 40 years and finally a homeowner in Boyle Heights as of 2020. My comment is against this proposed project. LA Metro is a public agency beholden to Angelenos and I am formally demanding that you not sell out our valuable public resources to private interests and instead put any available money and resources toward improving existing infrastructure, expanding current public transportation options for better coverage, and making it free like it was during the pandemic.

Response P747-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P747-2 If the goal truly is to get more cars off the street this is a much more effective and simpler solution. A gondola is absurd. It is not going to get Dodger fans out of their cars in the long term. I know because I am a Dodger fan and attended 10+ games last year. Those of us who already figured out how to get to union station to take the free

Dodger shuttle are already doing so. It's free. The reality is that those who have not done so, are not going to be prompted to give up driving due to a gondola.

Response P747-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Further, the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P747-3 Dodger traffic is a temporary problem while the money, time, and scenic resources we angelenos will have to give up for this gondola would be permanent.

Response P747-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P747-4 Those are all objective measurable facts. More subjectively, I believe the gondola would be an eyesore to our skyline. There is no other space like the land of State Historic Park and the free unobstructed space above it.

Response P747-4 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary

system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment Letter P748 – Elysian Valley Riverside Neighborhood Council

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P748

Comment P748-1 We know that the DEIR comment period has closed. However, we want to communicate with you and our new Mayor and Council members representing CD-1 and CD-13, covering immediately-impacted neighborhoods such as Chinatown, Cypress Park, Echo Park, Elysian Heights, Elysian Valley, and Historic Filipinotown, Solano Canyon, and Lincoln Heights, the reasons we oppose this project. We hope you will share this with the Metro Board of Directors.

We are concerned about the proposed Gondola for a number of reasons:

Response P748-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P748-2 through P748-11.

Comment P748-2 1. Despite being a neighborhood impacted by the Gondola, our Neighborhood Council was never invited for input, briefed on impact, nor considered in the Draft Environmental Impact Report.

Response P748-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English,

Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment P748-3 2. We do not support projects that gentrify our communities and economically displace our neighbors from their homes, due to increases in property taxes from property value hikes as well as non-Los Angeles Rent Stabilization Ordinance protected rents, and inflated costs of living.

Response P748-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P748-4 3. We are concerned about the social impacts of development and the high cost to the public to provide infrastructure for private development.

Response P748-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed

Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P748-5 4. We are concerned that this Gondola and subsequent development projects on private property around Dodger Stadium would generate economic displacement of low income families.

Response P748-5 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P748-6 5. We are concerned that should this Gondola project be approved, the greater public would be priced out of using these Gondola Stations.

Response P748-6 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P748-7 6. Will trips be offered at a reduced fare for seniors and students and local residents?

Response P748-7 Refer to Response P748-6 for discussion of the Community Access Plan which would all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost. As discussed in Topical Response N, Environmental Justice, the Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.).

Comment P748-8 7. We are concerned that parking in impacted neighborhoods would balloon, considering the limited parking space that currently exists in Union Station, Chinatown Station, and Lincoln/Cypress Station, and due to an influx of Gondola users who would opt to drive to Union Station to access this service.

Response P748-8 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment P748-9 We have many questions over the true public transportation value provided by this Gondola for city residents.

Response P748-9 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response P748-4 for an overview of the need for the proposed Project.

Comment P748-10 Alternatives: We recommend you consider as a non-driving alternative to the Gondola the construction of sidewalks from Dodger Stadium down Stadium way to Riverside Drive for pedestrians and cyclists. Although this was approved with funding in the Elysian Park Master Plan several years ago, sidewalks still have not been built. Furthermore, we believe that bus lanes which would run through Stadium Way and Academy Road with increased frequency on game days, paired with shuttles that run between bus stops and the stadium's myriad entrances, would encourage Metro usage and drastically decrease automobile traffic.

Response P748-10 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions

given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P748-11 On August 16, 2023, our Neighborhood Council voted to approve sending this letter (6 Yes; 0 No; 4 Abstentions).

Sincerely,

Carey McDonald, President

Elysian Valley Riverside Neighborhood Council

Response P748-11 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter P749 – Amanda Kazen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P749

Comment P749-1 Good afternoon,

My name is Amanda and I am with ConstructConnect. I had a few questions about the Los Angeles Aerial Rapid Transit (ART) Gondola System project in California . Specifically, I was hoping to find out:

* When is construction expected to begin?

* What stage of design is this project in?

* Who is the architect?

Thanks so much for your help. I look forward to hearing back from you.

Response P749-1 The Draft EIR addressed the construction schedule in Section 2.0, Project Description, of the Draft EIR. As stated on page 2-50, construction of the proposed Project is anticipated to begin as early as 2024 and take approximately 25 months, including construction, cable installation, and system testing. The detailed construction procedures informing the environmental impact analyses are included in Appendix B, Construction Assumptions, of the Draft EIR. Detailed design phases of the proposed Project would follow certification of this Final EIR and proposed Project approvals. Refer to Section 8.0, List of Preparers, of the Draft EIR for information related to the architects associated with the proposed Project.

Comment Letter P750 – Stop the Gondola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P750

Comment P750-1 We represent community-based organizations from across Los Angeles focused on protecting the interests of marginalized communities that have keenly felt the impacts of displacement and environmental injustice. This letter expresses our opposition to Frank McCourt's proposed gondola project from Union Station to Dodger Stadium. We have serious concerns it will have a negative impact on the neighborhoods surrounding Chavez Ravine, which include Chinatown, William Mead, Lincoln Heights, Solano and Bishops Canyon, and Echo Park.

Response P750-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Responses to the comments contained in this letter are provided below in Responses P750-2 through P750-9. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P750-2 The proposed gondola is neither a public transportation nor clean air project but rather a means to pave the way for Frank McCourt to develop the parking lots at Dodger Stadium. McCourt's attempt to brand this project as environmentally friendly and the solution to alleviate traffic to the ballpark are untrue. It is a tourist attraction that does nothing to further the genuine transportation needs of LA County.

Response P750-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Also refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The

proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment P750-3 Employing a Nobel Prize-winning method, The UCLA Mobility Lab conducted a study that indicates only 4,690 people would use the gondola on game days. UCLA estimates 8% of fans would take it to the game and only 2% on the way back. Evidence that the gondola will not reduce traffic but will shift it to Chinatown and the communities that surround the stadium. Shifting traffic to these communities will increase pollution there and increase the health burdens that go along with that

pollution. The claims that this is a zero-emissions project are, therefore, grossly exaggerated.

Response P750-3 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose.

Comment P750-4 Frank McCourt's plans to create a Dodger-themed entertainment complex similar to LA Live or the Grove are well documented. In addition, court documents related to bankruptcy proceedings and the original conditional use permit stipulate McCourt must replace parking spots or provide public transportation to the venue before development can move forward. We believe he is using LA Metro as a cloak to piecemeal this project using taxpayer resources and leverage the agency's credibility.

Response P750-4 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. As discussed in Topical Response G, the adoption of the Covenants, Conditions and Restrictions (CC&Rs) (the documents referenced in the comment) over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed and no environmental analysis is required of the speculations of commenters. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. The Project Sponsor has agreed to reimburse Metro for the fully burdened labor rate of all staff time spent reviewing the environmental documents for ART and, as determined by ARTT LLC and Metro, any community outreach by Metro during the CEQA process, and otherwise pay for the EIR preparer and technical consultants' work on the proposed Project.

Comment P750-5 Not only is this in violation of the State of California's CEQA laws, but it is also a recipe for gentrification on a grand scale. It will push out small business owners and residents who are already struggling with skyrocketing rents. If built, the projects will change these historic neighborhoods forever.

Response P750-5 Refer to Response P750-4 for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment P750-6 We also object to the lack of transparency and meaningful public outreach by LA Metro and McCourt's company LA Aerial Rapid Transit (LA ART). Public meetings that don't provide a forum for meaningful feedback, ask community groups to sign non-disclosure agreements, and then design a route that goes 40 feet over a residential zone is not public outreach. It's force-feeding a project to a community through backroom deals.

Response P750-6 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies,

organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment P750-7 As opposition began to mount against the project, Frank McCourt distanced himself from the gondola and announced he "donated" it to Zero Emissions Transit (ZET) a new environmental non-profit organization established by Climate Resolve. Neither organization has experience building or managing transportation projects. This week, Frank McCourt's companies refused to answer press inquiries and instead referred

questions to Climate Resolve. This is greenwashing pure and simple. The fact that McCourt brought a non-profit from outside our community to serve as a front for a project that won't reduce emissions or traffic is an insult to a neighborhood that has suffered more than its fair share of injustice.

Response P750-7 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities and would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise, including funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR would include analysis by a team of qualified experts, consultants, and engineers, including Fehr & Peers as to transportation; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; and Nabih Youssef Associates Structural Engineering as to structure engineering.

Comment P750-8 By the way, the sole source deal entered into by LA Metro, LA ART and now Climate Resolve does not live up to Metro's own procurement standards. It gives cover to a private project supposedly funded by private dollars (the details of the finance plan have not been revealed). It will be managed by a brand-new organization with no experience or money to complete it. We have to wonder if, ultimately, the taxpayers will be left holding the bag.

Response P750-8 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project

Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response P750-7 regarding ARTT LLC's continued funding and technical support, including funding for consultant and technical work provided by a team of qualified experts, consultants, and engineers with relevant experience and expertise in transportation and aerial transit systems.

Comment P750-9 As Metro proceeds through the draft environmental impact report, we implore you to reconsider the folly of moving forward with a project that does nothing to address the real transportation needs of our county and provides no guarantee that taxpayers won't pick up the tab for the advantage of one person.

Response P750-9 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P750-8 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment Letter P751 – Tony Torres

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P751

Comment P751-1 Cory,

We are pleased to support to Metro more than 6,000 cards signed by supporters of the LA ART project. These cards were collected from neighbors and businesses along the proposed alignment as a part of LA ART's outreach to the surrounding community. We are encouraged by the support that this innovative mobility project has received, as it will be an iconic and much-needed addition to LA's transportation network.

– Tony Torres

Response P751-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. This comment attached a link to access 6,078 comment cards indicating support for the proposed Project. These comment cards are available on the proposed Project's SB 44 website.

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FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

December 2023

State Clearinghouse No. 2020100007

VOLUME V

Prepared for:

Los Angeles County Metropolitan Transportation Authority

Metro

Prepared by:

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Expect More. Experience Better.

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Section 6.3.4 Responses to Public Hearing Comments

Public Hearing Comment PH1 – Xiagtian Xu

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH1

Comment PH1-1 My name is Xiagtian Xu. I've been a resident of Chinatown for over 20 years..

Response PH1-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH1-2 ..and now that the government has invested a lot of resources into the LA ART project, once I heard of the news, I was very happy along with a lot of my neighbors. Not only is this project not going to cause any environmental impact in any negative way, it provides great convenience to people who want to get around.

In Chinatown, many years we haven't seen many other issues and I hope that the government is able to invest more resources to bring about more projects like this that is going to provide great convenience and reap benefits to the people who live in this area.

Response PH1-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including, but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer

to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH1-3 In terms of our environment and our ecology, these are the things that we find very beneficial. And other problems that I mentioned before, the bus arriving on time, is making our commute very difficult and inconvenient. So this time, the LA ART project is bringing huge benefits to us. We are very much supportive. We're happy and we hope to see more of similar projects in our community to benefit the people and to benefit our environment.

And I would like to thank the government and everybody who are in involved in this project to bring such great convenience and benefits to us and as a community.

Response PH1-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH1-2 regarding the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Public Hearing Comment PH2 – Andy Hall

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH2

Comment PH2-1 I was born and raised in LA and I'm a long time community member of Chinatown.

Response PH2-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue of the content of the Draft EIR, no further response is warranted.

Comment PH2-2 I, my family, my neighbors, and the people of LA do not need the gondola project. This project is yet another misuse of our collective time, funds, and energy. No one asked for this and no one wants it. There are already public transportation and shuttles that bring people specifically to Dodger Stadium.

Response PH2-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment PH2-3 $125 million for a limited worth and limited use project is an irresponsible use of funds when what we desperately need is better public transportation and infrastructure. I am all my elderly-working neighbors should not have to wait an hour or two hours for the bus just to get home or anywhere.

Response PH2-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger

games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment PH2-4 There is no hospital in Chinatown because of gentrification. Many residents have to go to the USC hospital and the quickest bus route from Chinatown can be a 28 minute bus ride. Nineteen minutes of that is walking.

Response PH2-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH2-5 Many residents in Chinatown are elderly or disabled living on $1,000 a month with limited support networks. Put $125 million more towards eliminating transit fare and faster public transit to station hygiene to bus shelters and real ventures to affordable and free housing.

Response PH2-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, including Chinatown. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH2-6 Chinatown and LA as a whole has seen too many developments that ultimately harm this place and gentrify our communities. It's insulting that the people behind this project tried to mislead us into thinking that this project is a community good, to fool people into thinking that this is good for us. We know better than that. Yes, that's it. Thank you.

Response PH2-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Public Hearing Comment PH3 – Julie Rico

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH3

Comment PH3-1 I am opposed to the gondola project. I don't want the cars that are going to be displaced from the Dodger Stadium parking lot sent down to Chinatown where I live as a senior. It will create havoc in our neighborhood. It will suck all of the energy out of our neighborhood. There will be pollution, garbage, disease, and people will get run over because there's a lot of seniors in Chinatown.

Response PH3-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH3-2 It doesn't -- the gondola does not belong in Chinatown or anywhere near Chinatown. It will be intrusive to homes. It will be intrusive to our lives. It will change the flow of Chinatown as it is now.

I'm just vehemently opposed to the gondola project. That's it.

Response PH3-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Public Hearing Comment PH4 – Miguel Melgoza

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH4

Comment PH4-1 I have been a proponent of this project from the beginning. As a 15 year business operator in East Chinatown, I believe that this will be helpful to the community and also with transportation to Dodger Stadium. It will ease up on congestion with traffic.

Response PH4-1 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities.

Comment PH4-2 I think that we need to push this project and with the new city council coming into office, I think that she should also be very supportive of this project. Thank you very much.

Response PH4-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH5 – Jennie Linheya

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH5

Comment PH5-1 I find the gondola ugly because I've been to like several cities and I've never seen a gondola in big cities. The only city that I saw that gondola is Medelin, Colombia because they have no roads and it would cause –

Response PH5-1 Refer to Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, which provides examples of gondola systems in cities around the world. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. Refer also to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant.

Comment PH5-2 I don't want the taxpayer to shoulder the cost of this project because McCourt is rich enough to pay for his own.

If that's going to be built with public funding, the public funding should be for the people, not for a private company. And I know that they -- I read somewhere that it would cost $300 million with the inflation rate. I don't think it would be costing us more than $300 million to build this gondola. I'm done.

Response PH5-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Public Hearing Comment PH6 – Patrick Chen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH6

Comment PH6-1 My name is Patrick. I'm a resident of Chinatown for over seven years and I just want to give my comment on this proposed project, LA ART.

Response PH6-1 This comment provides a general introduction to comments contained in this letter. Responses to the comments contained in this letter are provided below in Responses PH6-2 through PH6-3.

Comment PH6-2 It does not look like it has the community's welfare in mind with its proposed plans. It doesn't seem like it's prioritizing the needs of the community in terms of transportation, housing, and other impacts. It seems like it's just like a vanity project for a billionaire.

Response PH6-2 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH6-3 And yes, Chinatown is facing lots of challenges, especially around gentrification, displacement of tenants, due to rising costs of housing and threats of eviction and another Metro project like that does not have community interest in mind does not seem like it would help the community at all.

So I oppose this project as it stands and I don't see really a path forward for it to actually benefit the community. Thank you.

Response PH6-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent

Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH7 – Rebecca Ocegueda

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH7

Comment PH7-1 Hello, good morning. My name is Rebecca Ocegueda. And I am a resident of Northeast Los Angeles.

Response PH7-1 The comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH7-2 through PH7-7.

Comment PH7-2 As a resident, I am concerned about his project for many reasons. First of all, the enormous towers of the gondola will cause aesthetic impacts on my community. I am concerned that the towers and the views of the wagons of the gondola will be used for publicity and as billboards.

Response PH7-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No

digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

Comment PH7-3 The gondola project will promote gentrification of our communities, in particular in Chinatown.

Response PH7-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH7-4 The gondola project will have a great impact on our public lands, especially in the Los Angeles State Historic Park with its enormous towers.

Response PH7-4 Refer to Response PH7-3 for discussion of the proposed Project's towers. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer Topical Response C, Project Features for discussion of the proposed Project's features to enhance and provide additional benefits to surrounding communities, including access to parks.

Comment PH7-5 This project will increase the impacts of air pollution on account of the emissions from the vehicles in the area that are already overloaded with air emissions.

Response PH7-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH7-6 This project will provoke displacement and will increase the cost of rent in the area and we cannot allow that and this is especially because for a lot of people it will increase the cost of rent and people will not be able to pay that and then we will have more homeless people.

Response PH7-6 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH7-7 And I beg you not to approve this project which will use federal funds and will use our taxes. And this will just enrich one person who will be benefitted by the project. And do not allow yourselves to be deceived by Mr. McCourt who has plans to develop the parking lot in the Dodger Stadium with the pretext that he's concerned about environmental pollution.

Thank you very much. Thank you.

Response PH7-7 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH8 – Esperanza Ramirez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH8

Comment PH8-1 My name is Esperanza. And I'm here regarding the gondola project that does not have benefits for our community. It is a lie that they will replace the vehicles that are going to the Dodger Stadium.

Response PH8-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH8-2 The gondola project will impact our cultural and historical resources such as our state parks, Union Station, and El Pueblo.

Response PH8-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources, including to the Los Angeles State Historic Park, LAUS, and El Pueblo, in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment PH8-3 The Chinatown community and our neighbors will be seriously impacted with the displacement from the property. The draft environmental report does not take into account our complaints and is concentrated on the benefits for our community and it's nothing but lies.

Response PH8-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during

this period led directly to changes to the proposed Project to incorporate public feedback.

Comment PH8-4 The gondola will be nothing more than an invasion of the properties of the Chinatown residents whose homes are underneath the trajectory of the gondola.

Response PH8-4 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH8-5 Mr. McCourt is taking advantage of our resources for his personal benefit. We do not want the gondola and we will fight for this project not to take place. That's all. Thank you.

Response PH8-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH9 – Robert Macias

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH9

Comment PH9-1 My name is Robert Macias. And I am the president of the Youth Soccer organization and community organization, the name is Anahuak. For many years, we have been fighting for the welfare of our families and for better recreational opportunities for our community.

Response PH9-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH9-2 through PH9-5.

Comment PH9-2 We are strongly opposed to someone with personal interest constructing an air highway over our state parks.

Response PH9-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide

additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment PH9-3 I ask myself where will we retain privacy for persons?

Response PH9-3 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH9-4 I beg you not to approve this project which will be use our federal funds and our taxes. We oppose this gondola. Our communities have stated our opposition and now it corresponds to you to say no to the gondola.

Response PH9-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH9-5 We do not want you to repeat the history that removed hundreds of Latino families from Chavez Ravine. Thank you very much.

Response PH9-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Public Hearing Comment PH10 – Gloria Andrade

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH10

Comment PH10-1 Hello. My name is Gloria Andrade. I am 76 years old. I have lived in East LA here for 35 years and for me I would say stop the gondola forever.

Response PH10-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH10-2 Our taxes and federal funds should not be used to make rich people richer. At this time, there's a lot of problems in the streets and we should also focus on these homeless people who are human beings. And we should be watching out for them. That's all.

INTERPRETER: Interpreter correction. Where it said -- where I said there are a lot of problems in the streets, I should have translated as there are a lot of indigent people in the streets. Thank you.

Thank you very much for your time. So I already said part of it.

Response PH10-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH10-3 It is nothing but lies. Mr. McCourt only wants to fill up his pockets with more money from our taxes. We oppose this gondola. Our communities have already stated their opposition and now it corresponds to you to say no to the gondola.

Response PH10-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on

the content of the Draft EIR, no further response is warranted. Refer to Response PH10-2 regarding the Project Sponsor and the proposed Project cost and financing.

Comment PH10-4 We do not want to repeat the history that pushed so many hundreds of Latina families out of Chavez Ravine. The gondola will not do anything to save the environment. Those are lies. Thank you very much for everything.

Response PH10-4 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Public Hearing Comment PH11 – Renee Young

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH11

Comment PH11-1 My name is Renee Young and I am the president of NAWBO-LA, the National Association of Women Business Owners and we are the unifying voice for more than 750,000 local women business owners in the region and we are very excited about the LA ART project.

Response PH11-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH11-2 We believe very strongly that this will bring business to local, small businesses in particular, entrepreneurs. We, as women, are one of the fastest-growing groups of entrepreneurs in the country and anything that drives business into our community, into our stores, into our companies we support. So we're very, very excited about this.

Response PH11-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses and how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. During construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH11-3 We are also very excited about the local business participation goal for 35 percent and we encourage the project as they move forward to make sure that we keep that as part of the goal and engagement because again the more we can drive business into our community, the more women business owners and all business owners can thrive and bring money back into our communities and this just goes to build back. Women who left the business world in droves during COVID, we want to be able to re-engage those women. We want to be able to offer them jobs and we believe that this project allows us to do that.

Response PH11-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment PH11-4 So again, we encourage the Metro and the team to really move forward with this project and we're looking forward to seeing it soon. Thank you.

Response PH11-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH12 – Juniper Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH12

Comment PH12-1 As a volunteer and worker in Chinatown who works with low income Chinese seniors, I do not support this project. Seniors with limited mobility do not want to be lifted into the sky. They want suspended buses and services in the area. They want reduced traffic on game days, not redirecting more traffic from the stadium to Chinatown where most people are projected to park with no accommodations.

Response PH12-1 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to the Parking Study for a discussion of the proposed Project's parking management plan.

Comment PH12-2 This past year, I've been canvassing for civic outreach in Chinatown. I've knocked on every door, met with nearly every resident asking what people wanted for the city. The answer was not a train in the sky to watch baseball games. The answer was affordable housing, a market, a grocery market in the neighborhood, a halt to the

rising cost of living which this gondola, as a tourist attraction, would only contribute to.

Response PH12-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH12-3 Where College Station was built, where one of the towers for this project is slated for, has already been developed into a Chinese center catering to well-off newcomers, not the long- time, low-income residents who they've already displaced and who continue to displace.

Response PH12-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment PH12-4 I believe LA Metro's priorities are skewed. There are other entryways to Dodger Stadium. Why choose to run this project through the second poorest neighborhood in LA? It says everything that you would spend time and money catering to a seasonal entertainment issue and not the truly urgent actually life-threatening issues of displacement that our most vulnerable Chinatown residents face which is becoming unhoused.

Response PH12-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for a discussion of why the proposed alignment and the proposed Project's Chinatown/State Park Station location was chosen. The proposed Project, in response to helping to promote and provide added connectivity to the Chinatown area, also located its Chinatown/State Park Station within a 3-minute walk to/from Metro's L Line (Gold) Chinatown station as a way to drive additional foot traffic to Chinatown and provide direct access to the Los Angeles State

Historic Park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing, and how consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects.

Comment PH12-5 And to that greater point, this whole process has been obfuscated and inaccessible for community input. Just today, I had tenants, Chinese seniors in attendance who wrote written comments. One of the interpreters read her comments in Chinese, came up to me and said her point of prioritizing affordable housing over the gondola was illegitimate. That is not his jurisdiction to say that to me. He cannot overrule a long time resident's personal point of view, that the land this is being built on should be used to better the most vulnerable in the neighborhood is absolutely a legitimate and glaringly urgent point of all of this.

Response PH12-5 In response to Comment Letter P133 regarding interpretation during the two public hearings held in December 2022, AECOM conducted an inquiry in conjunction with the consultant providing translation and interpretation services (LAT Multilingual) and summarized its results in a memorandum to Metro dated January 23, 2023, available on the proposed Project's SB 44 website.[1] As discussed therein, the LAT'S Multilingual interpreters stated that they did not take part in an interaction like the one described in the comment during the December 10, 2022, public hearing. The interpreters are certified and bound by a code of ethics that would prevent them from advocating a position in a setting such as this public hearing. The comment also describes the interpreter using male pronouns, but the Cantonese interpreters present at the December 10, 2022, public hearing were both female. Refer to Appendix B, Public Hearing Transcripts, for transcripts of all verbal comments received on the Draft EIR during the two in-person public hearings. In addition, refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

[1] Memo Documenting AECOM's Inquiry into Public Hearing Translator Comments (January 23, 2023).

Public Hearing Comment PH13 – Bill Chin

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH13

Comment PH13-1 Okay. My name is Bill Chin. B-I-L-L C-H-I-N. I've been looking at the boards that are on the easel. They tend to be very vague and I think they're very vague intentionally, so it's not within the capabilities of actually seeing towers when there are supposed to be towers very long and tall and they look very faint on purpose.

And there's also no scaling on there and the people from, I guess, MTA, who are running the show, they're kind of vague in terms of their language. They say it's a station as Bishop and Broadway. I said are you sure it's a station? Oh, no, it's a tower. No, it's a facility. I said what do you mean by facility? Well, it's like a tower, but it's bigger than a tower. I said well, what does it do? And he wasn't sure except that it has to be big, so they could turn.

Response PH13-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the format of the in-person public meetings immediately preceding and during the Draft EIR public review period, which were in the format of an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards, using the Key Observation Points (KOP) images (also known as key views) from the Draft EIR, summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). The meetings were staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the stations, towers, and junction for the proposed Project.

Comment PH13-2 So at that point I thought even I speak very clearly, concisely, and correctly in English, and when somebody is trying to help me understand the project, it doesn't seem to work out very well. It's very frustrating to read and not read too much which is vague and then somebody not being very clear, it's even worse. So I don't know if reading and listening is going to do anything because I can't experience it or understand it without some kind of preliminary sources. That's all I want to say.

Response PH13-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the translated materials and interpretation offered in several languages during the Draft EIR public review period. During the Draft EIR public review period, proposed Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH13-3 Okay, my name is Bill Chin, B-I-L-L C-H-I-N. I don't -- I'm against the gondola, but there are two things that I do like that I think can be done to improve the community where I live in Chinatown. One is to put more parkway that was proposed around the Chinatown station on the sidewalk, like trees and bathrooms and bicycle facilities that could be used for the Gold Line.

Response PH13-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment PH13-4 And the other things is the bridge, pedestrian bridge, they come from Broadway into the park could be very useful to cut down on traffic, so I don't have to take my car to the east side of the historical park in order to walk into the park. I can just walk while I'm shopping across Broadway into the park by way of a pedestrian bridge.

Response PH13-4 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, as well as between the Park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge

Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment PH13-5 So I am officially against the gondola, but I do see these two things as beneficial. I also want to say that the gondola station and the Union Station gondola station seems to be repetitive of the Gold Line since we do have people coming from Union Station who would go to Chinatown by way of the Gold Line and there is a Gold Line station in Chinatown already.

Response PH13-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. The proposed Project, in response to helping to promote and provide added connectivity to the Chinatown area, located its Chinatown/State Park Station within a 3-minute walk to/from Metro's L Line (Gold) Chinatown station as a way to drive additional foot traffic to Chinatown and provide direct access to the Los Angeles State Historic Park. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment PH13-6 So I think all that's needed is electric vehicles that would transport people from wherever that they need to come to Dodger Stadium either from Union Station or from Gene Autry Museum or from the airport or any other places, just like they do with the Hollywood Bowl. You can take a charter bus from Gene Autry to Hollywood Bowl. Thank you.

Response PH13-6 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded

Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment PH13-7 MR. CHIN: What do you need from me?

MS. KING: If you could just state and spell your name, please, and then you can begin your comment.

MR. CHIN: Bill Chin. B-I-L-L, C-H-I- N.

MS. KING: Great.

MR. CHIN: So this is being recorded and typed?

MS. KING: Recorded. The typing is just notes for now. It will later be transcribed I believe.

Response PH13-7 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH13-8 MR. CHIN: Oh, okay. So I heard that there might -- I heard that the California State Park that runs the historical park has not given permission yet or they're thinking about the gondola being part of or on the State Park property. So I was wondering, why is that? Is that because they're not committed? Or they just want to see what the interest level is before the state decides, okay. We'll go with public interest and compromise the design and the plan of our state park. Period.

Response PH13-8 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how responsible agencies for the proposed Project include the California Department of Parks and Recreation. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the

proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment PH13-9 My concern is, the state park has a goal in mind, and they've designed it well for the community. And I would not like to see their original plan compromised in any way by the gondola project, whether that means cutting trees or putting structure very close to the State Park where the State Park will feel like there is a compromise of the original design and landscaping or of cutting of trees because the cables are too low, or they need some height in the park to run their cars through the park. Period. Is that concise enough?

Response PH13-9 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation

property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment PH13-10 PARTICIPANT: That was perfect.

MR. CHIN: Oh, really?

PARTICIPANT: Yeah.

(Whereupon, the above-entitled matter went off the record at 10:24 a.m. and resumed at 10:32 a.m.)

MS. KING: All right. Your name again?

MR. CHIN: Bill Chin. B-I-L-L, C-H-I-N.

Response PH13-10 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH13-11 I looked at the project and the environmental. I probably don't have any problems with the five or six towers in terms of the height.

Response PH13-11 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the EIR, no further response is warranted.

Comment PH13-12 But LA and Los Angeles being so creative and also very close to the art industry and Hollywood, that there should be something done about concrete and more fashionable other than flat surface and square corners.

If you make it look like a tree or round off the corners like you see in modern apartments, where you take a piece of metal and nail it on the stud and then put sheet rock to it, then it softens the corner, just like in museums throughout the world. So that's not much to ask for because concrete can be molded into rounder corners. Make it look more organic. Period.

Response PH13-12 Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of the proposed Project design, which sought to minimize the perceived scale and mass of the stations and non-passenger junction, taking advantage of a simple barrel vault form to provide the minimum enclosure needed to protect the ropeway equipment and provide shade and weather protection to passengers on the boarding platform. This barrel form would utilize a hollow structural steel section structure and metal panel assembly to allow the introduction of custom perforation patterns that take

cues from the immediate neighborhood culture, while also providing a visual lightness to the form. Refer to Topical Response C, Project Features, for discussion of how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder groups, and the Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment PH13-13 MS. KING: Thank you.

MR. CHIN: I have something --

(Whereupon, the above-entitled matter went off the record at 10:34 a.m. and resumed at 10:40 a.m.)

Response PH13-13 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH13-14 MS. KING: Go right ahead.

MR. CHIN: My name is Bill Chin. B-I-L-L, C-H-I-N. I was at the booth for the aerospace. So the question was, will there be trees that will be cut? They said yes.

Response PH13-14 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located.

Comment PH13-15 And then I asked, why is it that all the maps in your EIR and on your project shows no scaling? Like no millimeter per feet or how many feet per millimeter on the two-dimensional maps? And he says, oh, we don't know. I said, it's not appropriate within your capabilities if you guys are all engineers.

But it's appropriate if somebody told all the engineers, don't put any scaling on it because we don't want the public to figure out how much distance or height is involved. And therefore there's not scale. Just a map and a legend. And I really, really oppose that. Why do you want people to review the information when they can't scale down any distances on every map on thousands of pages? PARTICIPANT: All done?

MR. CHIN: Thank you.

MS. KING: Thank you very much. Appreciate that.

Response PH13-15 Refer to Section 2.0, Project Description, of the Draft EIR for Figure 2-3: Proposed Project Location, Figure 2-4: Proposed Project Alignment, Figure 2-10: Proposed Alameda Station Location, Figure 2-12: Proposed Alameda Tower Location, Figure 2-14: Proposed Alpine Tower Location, Figure 2-17: Proposed Chinatown/State Park Station Location, Figure 2-19: Proposed Broadway Junction Location, Figure 2-21: Proposed Stadium Tower Location, and Figure 2-24: Proposed Dodger Stadium Station Location, which show maps of the proposed Project with scaling. Refer to Section 2.0, Project Description, of the Draft EIR for Figure 2-11: Alameda Station Cross Sections, Figure 2-13: Alameda Tower Elevations, Figure 2-15: Alpine Tower Elevations, Figure 2-18: Chinatown/State Park Station Cross Sections, Figure 2-20: Broadway Junction Cross Sections, Figure 2-22: Stadium Tower Elevations, and Figure 2-25: Dodger Stadium Station Cross Sections for cross sections and elevations of the proposed Project components and the respective dimensions of each. Section 2.0, Project Description, of the Draft EIR, refers to the proposed alignment profile provided in Proposed Alignment Plan and Profile (Appendix Q). Appendix Q, Proposed Project Alignment Plan and Profile, of the Draft EIR, includes the proposed alignment profile, which shows the heights of each proposed Project component in profile and the ropeway and provides a scale. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for discussion of how the proposed Project renderings were rendered in perspective to match the pedestrian eye level vantage point.

Comment PH13-16 MS. KING: All right. Just state your name one more time for us, please.

MR. CHIN: My name is Bill Chin. And it's spelled C, B-I-L-L, C-H-I-N. As I demonstrated to the recorder here that the Cantonese speaker does not really speak Taishan, and there were four Taishan speakers that came in. But they chose not to come in because they saw the sign that says Cantonese and no Taishan.

And it makes a big difference because Taishan could be intimidated. They're not educated, they're barely skilled, and to come into a big, unfamiliar place like this, it's not comforting for them to know that people don't speak their dialect. And I hope that changes in the future because it's been a misleading thing to not bring enough people from the community already. Thank you.

MS. KING: Thank you.

Response PH13-16 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the translated materials and interpretation offered in several languages during the Draft EIR public review period. During the Draft EIR public review period, proposed Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH13-17 MS. KING: And we're recording.

MR. CHIN: By name is Bill Chin. B-I-L-L, C-H-I-N. I've lived here for over 54 years in Chinatown. And I'm against the gondola because it seems like a repeat of the Gold Line with stations and Gold Line at Union Station and in Chinatown.

Response PH13-17 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment PH13-18 But I do like to have a couple of the benefits, which is a pedestrian bridge from Broadway into the historical park and to maybe see more trees along where the Chinatown Gold Line is located.

Response PH13-18 This comment indicating support for certain aspects of the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community.

Comment PH13-19 But I wanted to say that, when I'm traveling on Alpine and going eastward toward the post office, I see that the Gold Line has three towers that are very thick. And it's daunting that there's no trees all around those towers, very grey, massive, concrete towers. And even though these towers may be just as thick and not as closely sequenced, they should also have very well-maintained vegetation, if not because there are towers. It is because those places where those towers are, they should be landscaped with even more vegetation and without the gondola. Thank you.

MS. KING: Thank you.

Response PH13-19 As discussed in Section 2.0, Project Description, and visually in Figure 2-14, of the Draft EIR, the Alpine Tower would be located on a City-owned parcel, currently being used as non-public parking storage for City vehicles, at the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). The Alpine Tower would include the installation of landscaping and hardscaping near the base of the tower.

Comment PH13-20 MS. KING: Just go ahead and state your name one more time.

MR. CHIN: Yes. My name is Bill Chin.

MS. KING: Okay.

MR. CHIN: B-I-L-L, C-H-I- N.

MS. KING: And go right ahead, please.

MR. CHIN: I'm still l concerned that information on the board is so very vague. When I ask questions about the parking study, it wasn't articulated what day of the week and whether it was a weekend. It was just said that it was game day. And game day could fall on weekends as easy as it does on weekdays.

Especially on weekends, where Chinatown is highly, highly, highly tourist, and people from adjacent neighborhoods always come back to Chinatown to buy bags of rice or bring family members or even tourists. And they really occupy a lot of their private, as well as street parking, in the parking lot from very early morning all the way to the evening time on weekends throughout the year, especially during the summer months during game season as well.

So this is very vague because you don't read it on the board. You don't see it on the writing. You hear it only if you ask questions. But you don't get to experience it at a glance. And so you assume that the experts are telling the truth about how many parking spaces that are available.

But if you come on a weekend, it is not true. All the parking lots are filled, paid parking lots. And all the streets, you have to like double-park to wait for somebody to leave before you find parking. Thank you.

MS. KING: Okay. Thank you.

Response PH13-20 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and

with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH13-21 MS. KING: Ready when you are. Just state your name one more time.

MR. CHIN: My name is Bill Chin. B-I-L-L, C-H-I-N. I had a comment about LA Art, whether it's McCourt or whether it's a nonprofit. It seems the nonprofit, I have no confidence that they will be around after a gondola project like this is built, that they would be able to sustain the maintenance and the ongoing operating expenses for an endeavor like This throughout the year.

Whoever was chosen may be certified with nonprofit with the state, but I don't see that they have any resources that could manage with the operating expenses of a project like this and the amount of experience that they have. Thank you.

MS. KING: Thank you.

Response PH13-21 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH13-22 MS. KING: Recording.

MR. CHIN: My name is Bill Chin. B-I-L-L, C-H-I-N. I've seen and read parts of the EIR, so I understand the different heights of the tower, but they don't delineate where the heights are at every hundred feet or interval. It just is a very vague, saying that there's average height and maximum height. But they don't demarcate where they're located.

But being vague like that still doesn't stop me from asking if you are able to calculate the height of the towers and where the cables need to be.

Response PH13-22 As discussed in Section 2.0, Project Description, and depicted in Figure 2-4: Proposed Project Alignment, of the Draft EIR, the height of Alameda Tower is 195 feet, the height of Alpine Tower is 195 feet, and the height of Stadium Tower is 179 feet. Section 2.0, Project Description, of the Draft EIR, refers to the proposed alignment

profile provided in *Proposed Alignment Plan and Profile* (Appendix Q). Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, provides an overview of the various heights along the proposed Project alignment and the locations of the Alameda Tower, the Alpine Tower, and the Stadium Tower, as well as the ropeway, stations, and junction.

Comment PH13-23 I would like to see statistics on how deep each of the seven towers are in terms of footing and how deep they go into the ground and whether there's been any preliminary soil report to determine at what height those footings should be. Thank you.

MS. KING: Thank you. Appreciate you.

Response PH13-23 The Draft EIR addressed construction details, including maximum depths for drilled piles to support the proposed Project's stations, junction, and towers in Section 2.0, Project Description, of the Draft EIR. As discussed on pages 2-50 and 2-51, the maximum depth of the drilled piles required for the proposed Project's Alameda, Alpine, and Stadium Towers would be 120 feet. The maximum depth of the drilled piles required for the proposed Project's stations would be 125 feet for Alameda Station, 80 feet for Chinatown/State Park Station, 120 feet for Broadway Junction, and 55 feet for Dodger Stadium Station. Regarding a preliminary soil report, refer to Section 3.07, Geology and Soils, and Appendix I, Los Angeles Aerial Rapid Transit Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for information regarding the geology and soils at the proposed Project.

Public Hearing Comment PH14 – Andrew Vought

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH14

Comment PH14-1 MS. KING: All right. Recording is going. If you please state your name and spell it for the record.

MR. VOUGHT: My name is Andrew Vought. V as in Victor, O-U-G-H-T.

MS. KING: Great.

Response PH14-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH14-2 MR. VOUGHT: And I'm an Angeleno resident. I'm here today to voice my strong opposition to the proposed gondola. The only benefit from the gondola is that it allows a real estate developer to get richer developing the Dodgers parking lot. The rest of us all lose. Private gain equals public pain.

Response PH14-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for

other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH14-3 The Angelenos who use our beautiful state park lose. Two acres will be carved out of Los Angeles State Historic Park for a station, and gondolas will fly directly over the park. No more kite flying.

Response PH14-3 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.

Comment PH14-4 Dodger fans lose because the arithmetic does not work for the thousands of rides promised. Fans will need to wait one or two hours after the game for a six-minute ride. Who wants that?

Response PH14-4 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait

shorter durations. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

Comment PH14-5 Taxpayers lose because the cost of operating the gondola will not be paid by the billionaire developer. These costs will be paid by tax-payers.

Response PH14-5 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH14-6 This park was won in 2000 in a fight with real estate developers who wanted to put in big box warehouses. The people wanted a park instead, and we got our State Park. Now the State Park is again threatened by a real estate developer. Please don't destroy our State Park. Thanks. I'm sorry, I tapped that –

Response PH14-6 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Response PH14-5 for discussion of the Project Sponsor.

Public Hearing Comment PH15 – Marc Futernick

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH15

Comment PH15-1 MS. KING: -- minutes. Great, we're recording.

MR. FUTERNICK: Hi. My name is Marc Futernick. M-A-R-C. Last name F-U-T-E-R-N-I-C-K.

MS. KING: Please.

MR. FUTERNICK: I'm an emergency physician. I live in Pasadena, but I drive, every day that I come to work, through this area.

Response PH15-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further responses is warranted.

Comment PH15-2 I'm really focused on the impact of climate change and air pollution on our health, and this gondola will improve both of those. It'll open the door to another mode of zero-emission transportation here in Los Angeles.

Response PH15-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH15-3 The gondola will serve as a first and last-mile connector from our main central transportation hub at LA Union Station to Dodger Stadium, the most-attended venue in major league baseball that lacks a permanent transit option, and not just for games but for many events. This also makes a key transit connection to Elysian Park, the city's oldest and second-largest park and, again, is not currently served by transit.

Response PH15-3 As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit

system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park.

Comment PH15-4 And my main interest, personally, are the co-benefits of connectivity, active transport, reduced congestion, reduced greenhouse gas emissions, and decreased local air pollution in the surrounding communities of Solano Canyon, Victor Heights, and William Mead Homes. This will protect their health and improve people's daily lives in the area.

Response PH15-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could

result in air quality benefits for the surrounding communities. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment PH15-5 And lastly, zero-emission transit was formed to advance and accelerate zero-emission technology in the transportation sector, which is critical to a climate-resilient future for Los Angeles. And this project will demonstrate the value of this approach to the community and to our environment. Please approve this project.

MS. KING: Thank you.

Response PH15-5 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH16 – Teri Vanderberg

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH16

Comment PH16-1 MS. KING: All right. We are recording.

MS. VANDERBERG: Hi. My name is Teri Vanderberg, and I am a resident of Chinatown. I've lived here over a year. And the whole idea of a gondola would upset the entire feeling of Chinatown and all the elderly Chinese people that live here. And this is their livelihood. This is where they work.

Response PH16-1 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH16-2 They created that park for a safe place for us to all go walk, and I use that park twice a day for peace and quiet and tranquility. And having a gondola placed over in the park where people are going to be, by the thousands, getting on a gondola that is going to be charging $30 a person to go one mile, which is a free ride if you take it on the bus here at the train station, and which is what thousands of us do. And then they all park free on our little streets, and we all take a bus over there.

Response PH16-2 Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would

provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH16-3 There's no reason for a gondola. This is all about money. This is all about the gentleman who's proposing it because he wants to build beautiful buildings up there when the Dodgers aren't playing. So this has nothing to do with helping people, nothing for our community. It's all about money and wealth, and I'm very much against the gondola.

MS. KING: Thank you.

Response PH16-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and

open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Public Hearing Comment PH17 – Douglas Carstens, The California Endowment (TCE)

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH17

Comment PH17-1 MS. KING: All right. We are recording.

MR. CARSTENS: Hello. I am Douglas Carstens on behalf of the California Endowment. We've been reviewing the gondola EIR and have some initial comments with more to follow in writing. We oppose the gondola project. Metros should not be pursuing this private project at Frank McCourt's behest at all,…

Response PH17-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH17-2 …and Metro should not be the lead agency because the city of Los Angeles is in a much better position and is more properly designated as the lead agency. These points will be expanded in our comment letter.

Response PH17-2 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency.

Comment PH17-3 First, regarding the EIR, the California Environmental Quality Act, it's a bill of rights for an environmental democracy. It ensures the twin goals of public participation and environmental protection are met, and EIR is the heart of CEQA. An EIR is not supposed to be a sales brochure or an infomercial for the project.

It's supposed to be a unbiased, full-disclosure document that advises the public and decision makers of the impacts of a project and how those impacts can and will be reduced. The draft EIR presented by ARTT and Metro falls woefully short of these legal requirements for full and accurate disclosure and is biased in favor of the project.

Response PH17-3 Consistent with CEQA's requirements, the Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive

summary that explains the analysis and conclusions in clean and simple language. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) In addition, consistent with the requirements of CEQA, Metro has and will independently review, evaluate, and exercise its judgment over the proposed Project's environmental review and EIR. The Draft EIR that was circulated reflects Metro's independent judgment. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Responses PH17-4 through PH17-14 for further discussion regarding the adequacy of the Draft EIR as an informational document. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment PH17-4 The aesthetic impact analysis is a good example of how, instead of meaningful and accurate depictions of what the gondola towers and stations will look like in context, the EIR preparers have chosen distortions and force perspective depictions that minimize the visual impact of the towers and stations in context. Instead of –

Response PH17-4 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. As discussed in Appendix H.1, Memo Regarding the Preparation of View Simulations, of the Final EIR, KOPs selected for simulation will appear larger and more distinct than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Further, visual simulations were created to reflect the proposed Project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation. Refer to Appendix H.1 for further discussion of how the view simulations were prepared in order to realistically illustrate what the proposed Project will look like in the surrounding context.

Comment PH17-5 MS. KING: It's been two minutes.

MR. CARSTENS: Okay. Thank you. Useful information, the EIR provides misleading depictions and half-truths. Information about whether the gondola cars will be used for advertising and billboards is not disclosed, though it's known advertising will be a major component of the project. The omission and misleading half-truths is a common theme of different types of analysis in the EIR. In fact, the gondola's entire financial plan, when -- is my time up?

Response PH17-5 Refer to Topical Response K, Signage and Lighting, for discussion of how the proposed Project's Sign Concept Plan, included in Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static, non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local art collaborators. The proposed Project's proposed signage program will help to support wayfinding, transit connection, and funding for the proposed Project, and would reflect that the proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH17-6 It looks like you're --

MS. KING: Your time is up.

MR. CARSTENS: I just wonder, like can I make another set of comments or come back?

MS. KING: You can come back and restart your two minutes. Yeah.

MR. CARSTENS: Okay.

Response PH17-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH17-7 MS. KING: And we are recording.

MR. CARSTENS: Hello. This is Douglas Carstens, and this is the second half of my testimony because it was apparently two minutes on the first half.

In fact, the gondola's entire financial plan, which the Metro board was promised would be made available before the end of September 2022, is missing altogether. The gondola's missing financing is critical to understanding how impacts identified in the EIR will be mitigated by the project proponent and how they will not be.

Since the proponent, Frank McCourt, and his company, McCourt Global, has only committed to funding about three percent of the entire project budget, the shortfalls in construction and operating revenues will need to be made up somewhere, and it is most likely that some, if not all, will come from public transit funding sources, better used for public projects. Mitigation of identified impacts will be expensive but will be critical to protect the neighborhoods and people living and working near the project route.

Response PH17-7 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment PH17-8 Traffic, air pollution, parking, noise, and recreation will all be impacted.

Response PH17-8 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the

proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Section 3.16, Parks and Recreational Facilities, of the Draft EIR, for discussion of how the proposed Project's impacts to parks and recreational facilities during construction and operation of the proposed Project would be less than significant.

Comment PH17-9 The noise section of the EIR identifies that there will be significant and so-called unavoidable impacts from construction equipment. This noise and vibration will affect the neighborhoods around El Pueblo and in Chinatown. The vibration will threaten the physical integrity of the El Grito Mural and the Avila Adobe.

Response PH17-9 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. Construction noise impacts associated with the proposed Project were analyzed in the Draft EIR both for noise from on-site construction activities, meaning the noise from construction activities at each station, tower, and junction, and for off-site construction noise. Tables 3.13-17 and 3.13-18 on pages 3.13-35 to 3.13-45 of Section 3.13, Noise and Vibration, of the Draft EIR, show the locations where on-site construction noise impacts would occur during each phase of construction of the proposed Project, based on the L.A. CEQA Thresholds Guide and FTA analysis methods. As detailed therein, on-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. As demonstrated on Table 3.13-21 and explained on pages 3.13-51 to 3.13-52 of Section 3.13, Noise and Vibration, of the Draft EIR, off-site construction traffic noise impacts would be less than significant during all phase of construction of the proposed Project.

Refer to Section 3.13 and Appendix M for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. Table 3.13-28 on page 3.13-62 of the Draft EIR, show the location where on-site construction vibration impacts would occur during each phase of the construction of the proposed Project based on the FTA. As shown in Table 3.13-28 on page 3.13-62 of the Draft EIR, construction vibration velocities will not exceed applicable FTA structural damage criteria with implementation of mitigation at *El Grito* Mural or Avila Adobe. In addition, Mitigation Measures VIB-A (Vibration Monitoring) and VIB-B (Force-Adjustable Ground Compaction Devices) are designed to address potential building damage. As concluded in Table 3.13-28 on page 3.13-62 of the Draft EIR, with implementation of Mitigation Measures VIB-A and VIB-B during construction of the Alameda Station, vibration impacts related to building damage at the Avila Adobe, the Old Winery, and *El Grito* Mural, would be less than significant. Further, as demonstrated in Table 3.13-28 on page 3.13-62 of the Draft EIR, the proposed Project would result in significant and unavoidable vibration (human annoyance) impacts during construction of the proposed Project. In addition, as detailed on page 3.13-72 of the Draft EIR, relevant protective measures are also included in Section 3.05, Cultural Resources, with CUL-PDF-A through CUL-PDF-E, which require pre-construction surveys to document existing conditions at The Winery and *El Grito* Mural, post-construction inspections to document any construction-related damage, and retention of an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the proposed Project.

Comment PH17-10 These impacts can be avoided by denying the project altogether or choosing the environmentally-superior alternative which, in the EIR is called transportation systems management, what comes down to enhancement of the Dodger express buses system.

Response PH17-10 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH17-11 The California Endowment opposes Frank McCourt's gondola and the potential waste and gifting of tax-payer resources that it represents, including public land, such as allowing Alameda Street and at the State Historic Park. The implications of which –

Response PH17-11 Refer to Topical Response L for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total -32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH17-12 MS. KING: Thank you.

MR. CARSTENS: Oh, is that time?

MS. KING: That's time.

MR. CARSTENS: Okay. And let me see --

(Whereupon, the above-entitled matter went off the record at 10:54 a.m. and resumed at 10:55 a.m.)

MS. KING: And just your name again.

MR. CARSTENS: Okay. My name is Douglas Carstens, and I'm here on behalf of the California Endowment.

Response PH17-12 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH17-13 So the California Endowment opposes Frank McCourt's gondola and the potential waste and gifting of tax-payer resources that it represents, including public land such as allowing Alameda Street and at the State Historic Park, the implications of which the Environment Impact Report only partially discloses in more incomplete and misleading half-truths.

Response PH17-13 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response PH17-11 for a discussion of the Project Sponsor, funding and financing for the proposed Project, and how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties.

Comment PH17-14 Instead of promoting a private gondola to a private sport stadium, more like an amusement park ride than actual public transit, Metro should focus on enhancing actual public transit options with its limited resources and staff and board time.

Response PH17-14 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Refer to Response PH17-11 for a discussion of how no public sources of funding have been sought or committed to the proposed Project.

Comment PH17-15 We ask that you terminate the project review process immediately. If you do not terminate the project immediately, you, Metro, should transfer lead agency status to the city of Los Angeles to complete review and processing of the gondola project. Metro should not let itself be co-opted to serve the private interests of a billionaire, especially one who has bankrupted such a revered organization as the Los Angeles Dodgers. Stop the gondola now. Thank you.

MS. KING: Thank you very much.

Response PH17-15 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as

a CEQA responsible agency. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH18 – Kenneth Chan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH18

Comment PH18-1 MS. KING: We're recording. If you could just state your name and spell it before you begin.

MR. CHAN: Yeah. Kenneth Chan. K-E-N-N-E-T-H. Last name, C-H-A-N.

MS. KING: Thanks. Go ahead.

MR. CHAN: Yeah. Coming out. I think I'm against this project. There's not enough analysis on housing and gentrification from what we've seen. Every time Metro comes in here and builds one of these projects, it encourages market-rate development and displaces longtime tenets.

Response PH18-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH18-2 In addition, this is really treating our neighborhood like a playground. It is not a good use of funds. You know, we still have some of the worst-maintained sidewalks, streets in our neighborhood. We have a huge demand and need for affordable housing in our neighborhood. This will not resolve Chinatown's transportation issues. It should not take me two buses to get to downtown.

Response PH18-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space

enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH18-3 Overall, I think this project is a waste of funds, and the show that's been put on today completely ignores the community. And yeah. I think that building this project would be a huge waste of funds and a huge mistake, and if folks continue to proceed with this and ignore the voices of the community, they're going to meet some real resistance. And I think it'll be a waste of time for everybody.

So again, you know, we have a real need for affordable housing and a real need for real transit solutions, not some playground BS that's being funded by Frank McCourt.

MS. KING: Thank you very much.

PARTICIPANT: All right. Thank you.

Response PH18-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public

Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage the community in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH19 – Jonathan Berman

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH19

Comment PH19-1 PARTICIPANT: State and spell your name

MS. KING: All right.

MR. BERMAN: Does the two minutes include my name-spelling?

PARTICIPANT: No. I'm going to start it right after you finish.

MS. KING: We're recording now, so.

MR. BERMAN: I have a very long name. Ready?

MS. KING: Yes.

MR. BERMAN: Jonathan Berman. J-O-N-A-T-H-A-N, B-E-R-M-A-N.

Response PH19-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH19-2 MR. BERMAN: Now? I am currently against this project for a number of reasons. First of all, it feels like a massive boondoggle of the ownership of the area of Dodger Stadium. My understanding of it is Frank McCourt and related people, who's already bankrupted the Dodgers and other professional teams, and that the end game of all of this is the development of those parking areas in Dodger Stadium as some kind of mall or LA live type of situation. So not being transparent about what that is. Furthermore -- let me know if I'm going too fast.

MS. KING: Okay.

Response PH19-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other

applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH19-3 MR. BERMAN: Furthermore, this particular event here is incredible biased. You have 20 booths manned by people, persons, by people who are in the employ of the people who want to move this forward. And the results seem pretty ordain. It's always no significant impact.

Response PH19-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who had set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH19-4 Crowd control. You're going to have, for the games, 10 -- are we out of time? Are we going to have like 10,000 more people getting out of the stadium at the same time getting into these gondolas? That's going to be a special show of consternation. So yeah.

Response PH19-4 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds, in contrast to the existing Dodger Stadium Express, which has much longer gaps in bus departures (from 3 to 19 minutes spacing between bus departures based on 2023 season observations further described below). The comment incorrectly uses "queue" to refer to the total service time needed to transport riders from Dodger Stadium post-game. Actual riders would be waiting in the queue for shorter time periods. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, four post-game time periods were observed during the 2023 season. These games were selected to reflect the mix of game times, days and opponents. As noted below, the service time from the first bus departure to the last bus departure was nearly 2 hours, with the last bus departing up to 90 minutes after the end of the game. The amount of time between the end of each game and the departure of the last bus varied, with the June 15th and June 16th games both going into extra innings. Additionally, the June 16 game had a post-game drone show. While the Dodger Stadium Express has the capacity to carry approximately 1/5th of the riders of the proposed Project, its service time needed to load all riders is equivalent to that of the proposed Project in 2042, and longer than the needed service time for the proposed Project's 2026 opening year ridership estimate.

- Sunday, June 4, 2023 (Yankees)—1 hour 50-minute service time; 1 hour 30 minutes post-game
- Thursday June 15, 2023 (White Sox) —1 hour 54-minute service time; 49 minutes post-game (game ended in 11th inning)
- Friday, June 16, 2023 (Giants) —2-hour 27-minute service time; 52 minutes post-game (game ended in 11th inning)
- Saturday, June 24, 2023 (Astros) —1 hour 15 minutes service time; 1 hour 15 minutes post-game

Comment PH19-5 My main -- also the environmental review. The idea that there are 10,000 parking spots in Chinatown is laughable at best given that most of these, many of these properties are being redeveloped as commercial or residential properties, some of the lots close at night.

Response PH19-5 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH19-6 So I just think it's not that well thought out. I mean the ultimate thing is that this funding that will ultimately come out of taxpayers' dollars should go towards homeless, helping get people off the streets, mentally-ill people and other people who are living on the streets, rather than putting billions towards a project that's not going to happen in the four --that this will come out in four years is insane. That's not going to happen.

PARTICIPANT: Thank you.

MS. KING: Thank you.

Response PH19-6 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Public Hearing Comment PH20 – Baldomero Capiz

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH20

Comment PH20-1 MS. KING: So we're recording now, and you can just start by stating his name and spelling.

MR. CAPIZ (Speaking through translator): My name is Baldomero Capiz. B-A-L-D-O-M-E-R-O. I am the president of the organization National Union of Ex Berceros. As a community leader, it is our responsibility to ensure that our taxes are not used for the benefit of third parties.

Response PH20-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH20-2 The gondola project is nothing more than an attraction, which has nothing to do with the protection of the environment. Metro already has a bus system which takes fans to the Dodger Stadium, and it is free. This project will only take advantage of our taxes for the benefit of a person who wants to make him or herself more rich.

Response PH20-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed

Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH20-3 The gondola will only displace many residents in Chinatown, just as Latino residents were displaced from the lands where they now are living in Dodger Stadium -- where Dodger Stadium is now located, rather. Correction.

We oppose the gondola in honor of people who are known as landless, including the Ex Barceros. We robustly oppose that anyone with personal interests would construct an aerial transport.

MR. CAPIZ: That's it.

MS. KING: Great. Thank you.

Response PH20-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents

an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH21 – Maria Elena Padino

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH21

Comment PH21-1 MS. KING: Okay. Name and spelling, please.

MS. PADINO (Speaking through translator): My name is Maria Elena Padino. M --or sorry. Correction. M-A-R-I-A, E-L-E-N-A, P-A-D-I-N-O.

MS. KING: She can begin.

MS. PADINO: I am a member of the organization Anahuak. Our organization has fought to be able to have more green spaces and parks so that our children are able to play. For many years, we have fought for our well-being, the well-being of our families, rather, and for better recreational opportunities for our community.

Response PH21-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH21-2 We do not want people with money, with personal interests to build an air highway above our State Park because it is abusing the privacy of people by having a gondola that would go over the homes of these people. Doesn't the privacy of these people count?

Response PH21-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of

commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH21-3 We ask for you to listen to us and for you to reject this project which will use our federal funds and our taxes. We oppose this gondola. Our communities have already demonstrated our opposition, and now it corresponds to you all to say no to this gondola. Thank you so much.

Response PH21-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Public Hearing Comment PH22 – Disraely Butler

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH22

Comment PH22-1 MS. KING: We are recording. If you could please state and spell your name.

MR. BUTLER: My name is Disraely Butler. D as in David, I-S-R-A-E-L-Y. Butler the way it sounds.

MS. KING: Got you. And you can begin.

MR. BUTLER: All right. And do I need to state my case, honey?

MS. KING: Yes, please.

MR. BUTLER: Okay. Wonderful project. Of course, our Founding Fathers would be so proud of what we're doing here and what you guys are doing. And, of course, the great Nubian Pharaohs.

Response PH22-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH22-2 My only concern is the noise factor. LAPD needs to relocate their heliports. They're flying too low, it's too noisy, and because of the Kobe Bryant incident, there is a situation that could be very dangerous, you know, with some mechanical failures.

Response PH22-2 The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix O, Airspace Analysis Technical Memo. The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Refer to Draft EIR Appendix O, Airspace Analysis Technical Memo. That analysis, based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports in the proposed Project's vicinity. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant.

Comment PH22-3 The other situation, there needs to be more regulation of the actual train horn industry. You can't always have everything on 16 when you can turn it down to 8 and 7 and still have the same results. What's happening in our communities? People are getting vertical, the rooms are spinning around, blood pressure levels are going up, and all the other complicates related to frequencies. So those can be taken care of, I think everything else will take care of itself.

MS. KING: Great.

MR. BUTLER: See? I made it short.

MS. KING: Look at that. Thank you very much. Appreciate you.

Response PH22-3 Refer to Response PH22-2 for a discussion of how the proposed Project's operational noise impacts would be less than significant.

Public Hearing Comment PH23 – Tany Ling

The full bracketed letter is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH23

Comment PH23-1 MS. KING: All right. So just your name and the spelling, first, please?

MS. T. LING: My name's Tany Ling. T-A-N-Y, L-I-N-G.

MS. KING: Perfect. And you can begin.

MS. T. LING: Okay. I'm a resident of Chinatown. I am against this project. I think it's a giveaway to a billionaire, and I think Metro should listen very closely to the people who are raising alarms about this. Why are we constantly giving away the city to billionaires? Who are they really serving because it's not really the people? It's usually -- and the bottom line is, it's all about money, okay?

So I think the project is masquerading as a, it's masquerading as a public transit project for the greater good, but it's really a means for a billionaire to use public money to take a step forward towards achieving his planned huge development project at Dodger Stadium and all the while promising that it won't cost taxpayers money.

Response PH23-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Topical Response L, Project

Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH23-2 But he has already transferred the operation of this project to a nonprofit. And guess what? Nonprofits can apply for federal and state funding, which is paid for by taxpayers.

Response PH23-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Response PH23-1 for detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment PH23-3 There's been studies done to show that this will not improve traffic in the area. It will not improve air quality. It will actually, could possibly bring more cars into the area.

Response PH23-3 The commenter may be referring to the UCLA Mobility Lab Study. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH23-4 It's going to be traveling not near people's homes but over people's homes and not 400 feet in the air but possibly as low as 40 feet in the air above people's heads, above people's roofs.

Response PH23-4 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project alignment was chosen as it maximizes alignment over the public ROW and publicly

owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As discussed in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the proposed Project requires certain aerial rights over private property located at 455 Savoy Street and 451 Savoy Street. The proposed Project's approximate cable height over the 455 Savoy Street property and the 451 Savoy Street property is approximately 70 feet and the bottom of the cabin height over the 455 Savoy Street and the 451 Savoy Street property is approximately 49 feet.

Comment PH23-5 I am against this project also because it's going to completely change the character of the State Park. Cutting down trees, putting these tall imposing towers and stations in the State Park that the community worked so hard to bring to life and to have this beautiful, open space for everybody to enjoy. It can't happen. Let's not let it happen.

Response PH23-5 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Public Hearing Comment PH24 - Phyllis Ling

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH24

Comment PH24-1 MS. KING: All right. And your name?
MS. P. LING: Phyllis Ling.
MS. KING: And could you spell that please?
MS. P. LING: P-H-Y-L-L-I-S, L-I-N-G.
MS. KING: Great. And please.

Ms. P. LING: Yeah. I think with this draft Environmental Impact Report, I think something that needs to be said is that there's still no funding plan and that all of these impacts and mitigations proposed are meaningless if there isn't sufficient finding for this project.

The fact that Metro is doing this draft EIR before there is any funding plan is a huge disrespect to our communities. It's wasting our time. It's putting residents like me in the position of having to spend thousands of dollars on consultants and thousands of hours reading an 8,000 plus page draft Environmental Impact Report,

Response PH24-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded. The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment PH24-2 It costs a lot of money to operate and maintain systems like this, and it would run over our homes and public spaces. A system that isn't even properly maintained will be noisy and unsafe and fall into despair, be gratified over, and be a visual blight.

Response PH24-2 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator. The overall system would be observed on a daily basis as part of the startup routine. As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, the proposed Project technology is quiet, and noise impacts from operation of the proposed Project would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola

Design and Operations, of the Final EIR for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Refer also to Response P702-36 regarding vandalism. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH24-3 Crowd control is a huge control. It's largely ignored or dismissed in this draft EIR. People can die from crushing injuries and stampedes. It's a huge issue. You're trying to squeeze 40 people into each cabin. After events, a lot of people will be drunk. There's very little consideration for the impacts that will have, the liabilities that will impose on the city if it takes responsibility for this system.

I think you have to consider what happened after the Elton John concert in the parking lot. People bumping into each other in crowded spaces, bumping into cars, bumping. That's a huge issue. A lot of fights start that way, especially at Dodger Stadium.

Response PH24-3 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of the proposed Project's queuing and ticketing/fare checking, including how ticketing for the proposed Project would use either a chip-based card system or electronic ticketing, where riders would pre-purchase their ticket prior to entering the boarding platform and fares would be checked using a card reader/scanner.

Comment PH24-4 And crown control at the stations is a big issue also. There's very little explanation for how the lines will be spread out. We can't expect a magical ticketing system, reservation system to spread people out evenly over a two-hour period before and after games. And how are people going to arrive on time for a gondola reservation if they're supposedly taking transit to the gondola stations? And who will be able to reserve these tickets anyway? Is this going to be equitable or will VIPs and certain members of clubs have early access to reserve tickets? I think I've used up my time, but can I keep going?

PARTICIPANT: Go ahead.

Response PH24-4 Refer to Response PH24-3 for discussion of the proposed Project's queueing and ticketing/fare checking. Refer to Response P702-6 for discussion of the proposed Project's time ticket reservation system, the purpose of which would be to reduce queue lengths and waiting times for riders waiting to board the proposed Project at the Alameda Station or the Chinatown/State Park Station before a large game or event at Dodger Stadium by managing arrival times. Potential elements of such a system could include: the timed arrival reservations would be free; the reservation system would be online; for those without online access, kiosks could be provided at LAUS, the Chinatown/State Park Station, and/or at Dodger Stadium; reservations would be issued for 30-minute arrival periods and the user would pick a time and the boarding station; the timed ticket reservations would be transferable similar to how game and event tickets themselves are transferable; the timed tickets would be checked by proposed Project staff at the entrance to the line; those who arrive earlier than their arrival window would be fed into the boarding line when possible in advance of their arrival window or wait until their arrival window; those who arrive later than their arrival window would be held and fed into the boarding line when possible; incentives could potentially be offered to encourage choice of earlier windows; and there would be no exclusive access to preferred arrival windows to particular groups of people. The timed ticket reservation system would likely not be used post-game. The system will be more fully developed prior to proposed Project operations.

Comment PH24-5 MS P. LING: I think visual impacts are a big issue as well. You have these leaning towers that don't look very stable or balanced. They don't have the sense of goof Fung Shui. I don't know if that's going to be addressed in the final EIR. Seems that it would be important to consider Fung Shui in Chinatown.

Response PH24-5 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness

to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment PH24-6 And then visual blight of advertising all over the gondola cabins, stations, and towers. This is going to be owned by a private company. Are there any limits to what they can advertise? Personally, I wouldn't want to see advertisements for liquor, alcohol, online gambling, cannabis, campaign and political ads, ads for authoritarian governments' propaganda, PR during the Olympics constantly streaming over my neighborhood. Those are just a few things.

And would we have any say as a community as to what messages are constantly being streamed over our neighborhood? The visual impact is that this would turn our neighborhood into an advertising district and Disneyland type of amusement park. It would cause destructive driving, it would hurt seniors, pedestrians, and cyclists. All right. Thank you.

MS. KING: Thank you. Appreciate it.

Response PH24-6 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included in Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local art collaborators. Further, there is existing signage in the proposed Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART

system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. Regarding sign content, the Los Angeles Municipal Code Section 14.4.4 prohibits signs that contain obscene matters, as defined in Section 311 of the Penal Code of the State of California. Outside of the prohibition on obscene matters, signs have free speech protections under the First Amendment of the United States Constitution and accordingly sign regulations are generally content-neutral and instead focus on time, place, and manner regulations. Nevertheless, the proposed Project's signage would be designed to be consistent with Metro requirements, including Metro's Advertising Content Guidelines as applicable, which are updated from time to time. Metro's Advertising Content Guidelines include a number of restrictions on advertising, including prohibiting the advertising of all alcohol, tobacco, and cannabis products, services, and events. Metro's Advertising Content Guidelines also provide that advertising may not be displayed if its content involves: illegal activity; violence; demeaning or disparaging matter; vulgarity; obscene matter; adult entertainment and content; political endorsements; religion, negative connotations of public transit; unsafe transit behavior; content injurious to Metro's interests; or content harmful or disruptive to the transit system. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH24-7 MS. KING: All right. Go right ahead.
MS P. LING: Phyllis Ling. P-H-Y-L-L-I-S, L-I-N-G.
MS. KING: Oh, go right ahead.

MS: P. LING: Okay. So my comment is that the parking study, I think we were told it was not part of the Environmental Impact Report. But it is being presented here on a board, and so it's a little big confusing. Personally, I do think it should part of the Environmental Impact Report because it would – people driving to the gondola

stations and parking in our neighborhoods will have an impact on traffic flow in our neighborhoods.

And the fact that it's being presented here but then not a part of the Environmental Impact Report, to me, that's just very confusing. And it seems like it sets it up as where it's, the parking study doesn't need to be as thorough or doesn't need to meet a certain standard as a separate study outside of the Environmental Impact Report.

It's just very confusing as to the status of that. And I think it should be officially included in the final report.

Response PH24-7 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to affect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH24-8 And I think there should be additional public review and extended review time when the final EIR is released. Thank you.

MS. KING: Thank you.

Response PH24-8 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH25 – Eric Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH25

Comment PH25-1 Wonderful idea. Good for transportation, good for environment. Do it!

Response PH25-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH25-2 At Dodger Stadium – make walkways either under roads or build bridge over roads to alleviate any foot congestion slowing traffic.

Response PH25-2 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH26 – Maria Salnejon

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH26

Comment PH26-1 It will be fabulous to have this type of transportation for the tourists and for all type of people.

Response PH26-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH27 – Renee Young

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH27

Comment PH27-1 As the premier women business owners organization in the region (NAWBO – LA) supports the LA ART project. We are excited to have this project in our community to bring business to those who are part of this community.

Response PH27-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH27-2 NAWBO LA encourages the LA ART project to contract with local and small businesses with a 35% participation.

Response PH27-2 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses. Refer to Topical Response C, Project Features, for discussion of how the proposed Project has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Public Hearing Comment PH28 – Guan Bao

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH28

Comment PH28-1 Strongly support. Lichang Fang.

Response PH28-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH29 – Andrea Lacaza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH29

Comment PH29-1 Construct the gondola now!

Response PH29-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH30 – Maribel

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH30

Comment PH30-1 The information we have heard today about the Gondola Project is extensive and understandable to people because the information is in different languages, so I like the information given today, and the Gondola Project is going to bring benefits to the area.

Response PH30-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding, during, and immediately following the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH30-2 People will be able to look at the project, which is very fast, comfortable and accessible to all the people. It is something we can all experience.

Response PH30-2 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Public Hearing Comment PH31 – Fernando Quesada

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH31

Comment PH31-1 Build The Gondola

Response PH31-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH32 – Simon Fraga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH32

Comment PH32-1 I support the gondola.

Response PH32-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH33 – Abram Illescas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH33

Comment PH33-1 I love the gondola and all benefits it would bring.

Response PH33-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH34 – Amparo Cabrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH34

Comment PH34-1 Great project to reduce pollution, it is faster than the bus, it will reduce traffic in my community and there will be more parking for us and our neighborhood.

Response PH34-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH35 – Socorro Lugo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH35

Comment PH35-1 I support the gondola because it will reduce traffic, make the city more beautiful, it will be very complete for tourists, free for neighboring communities and a better future for transportation.

Response PH35-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH36 – Fang Li Chan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH36

Comment PH36-1 Fully support.

Response PH36-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH37 – Juniper Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH37

Comment PH37-1 As a volunteer and worker in Chinatown who works with low income Chinese seniors, I do not support this project. This gondola has been ushered through by Frank McCourt to cater to Dodgers fans and not the actual residents. This entire process has left out the most vulnerable in the community and will further displace people by raising the cost of living.

Response PH37-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project alignment and the location of Chinatown/State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment PH37-2 Just today, I invited tenant seniors who submitted written comment. One of the interpreters read her comment in Chinese, came up to me, and said her point of prioritizing affordable housing over the gondola – was illegitimate. This is grossly inappropriate for him to do. That the land this is built on should be used for public good over private interest is within a resident's right to say. It is the most urgent point in all of this. This project is full of misconduct, from the funding, to the botched public process.

Response PH37-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response PH37-1 for discussion of how Metro sought to engage the community in each stage of the environmental review process and the Draft EIR public review period.

Public Hearing Comment PH38 – Karina Ramos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH38

Comment PH38-1 How secure is the ride?

What are some safety concerns and what are some safety measures.

Response PH38-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project, and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine. Further, system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station, and a separate operator would be stationed in a control room to monitor activity throughout the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Public Hearing Comment PH39 – Gustavo Gonzales

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH39

Comment PH39-1 Good for pollution and taking cars off the road.

Like that good for environment!

Response PH39-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH40 – Maria L.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH40

Comment PH40-1 I am in favor of this project since it can make commuting to the stadium easier, attract more tourism and result in less traffic, and it does not pollute so much.

Response PH40-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH41 – Lucrecia Vargas D.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH41

Comment PH41-1 It will be a great and fabulous project, because I think that this aerial transportation will be very helpful to the community of Los Angeles. More tourists would come here.

Response PH41-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH42 – Claudia Vasquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH42

Comment PH42-1 It would be fabulous to have that form of transportation, a great improvement for the community.

It would improve the [illegible].

Response PH42-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH43 – Tany Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH43

Comment PH43-1 I am against this gondola project. This is masquerading as a public transit project for the greater good, but it is really a means for a billionaire to use public money to take a step forward achieving a huge development project at Dodger Stadium – all while costing taxpayers millions of dollars,

Response PH43-1 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH43-2 making traffic worse, and destroying the LASHP and the surrounding neighborhood.

Response PH43-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy

would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH43-3 Chinatown residents didn't ask for this and have no practical use for this. There are less expensive actions that can be taken to truly alleviate the traffic issue at a lesser cost. Expand and streamline access for Dodger Stadium Express buses -- this requires no permanant damage to the community with intrusive infrastructure or noise/visual blight. Chinatown is not for sale to this billionaire.

Response PH43-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Commitment to Community Benefits, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional

pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems,

3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including to scenic or panoramic views. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH44 – Luis Ramos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH44

Comment PH44-1 I like the idea for the project to reduce traffic congestion, & less pollution in the air. Also free to dodger fans & easier access to dodger stadium.

Response PH44-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH45 – Maria Gutierrez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH45

Comment PH45-1 I strongly support Aerial project for many reasons, one of them being less traffic and faster transportation to stadium, secondly it being free with purchase of ticket to game, and last but not least less pollution for the environment.

Response PH45-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH46 – Drew Miller

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH46

Comment PH46-1 The Los Angeles Aerial Rapid Transit project is an important opportunity to solve advance zero emissions transportation to build a healthier and more environmentally responsible Los Angeles. LA ART would be the first permanent rapid transit connection from the region's transportation hub, Union Station, to Dodger Stadium and Elysian Park.

Response PH46-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH46-2 This would remove thousands of vehicles from the road, thus reducing congestion and pollution while providing a unique and safe experience for the community. As rising temperatures from human caused greenhouse gases threaten Los Angeles and civilization as we know it – the time to act is now.

Response PH46-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH47 – Disraeli Butler

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH47

Comment PH47-1 Great project that would make our founding fathers proud that is bringing innovation, peace, and harmony to our nation and people during these challenging apocalyptic times…

Response PH47-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH47-2 Because this region is being impacted by multiple noise factors that are the underlying causes of vertigo, stress, and blood pressure levels… LAPD heliports need to be relocated, and train horns regulated

Response PH47-2 The Draft EIR addresses potential airport hazards in Section 3.09, Hazards and Hazardous Materials, with supporting data provided in Appendix O, Airspace Analysis Technical Memo. The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Refer to Draft EIR Appendix O, Airspace Analysis Technical Memo. That analysis, based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports in the proposed Project's vicinity. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project. Refer to Section 3.13, Noise and Vibration, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the noise impacts from the proposed Project. As detailed therein, operational noise impacts would be less than significant.

Public Hearing Comment PH48 – Dong Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH48

Comment PH48-1 I live in William Mead.

I support the Gondola Project.

It will be good for our community

Response PH48-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH49 – Moon Smeyev

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH49

Comment PH49-1 I live in William Mead.

I support the Gondola project.

Response PH49-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH50 – Jose Roberto Garela

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH50

Comment PH50-1 I support the project. It is something really great for the community because it will help people to commute.

Please approve the gondola.

Response PH50-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH51 – Juana Noriega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH51

Comment PH51-1 We support it because it is good for the community. If it was bad, we would not support it, but it is beneficial to the community.

I support the gondola.

Response PH51-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH52 – Wences Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH52

Comment PH52-1 I support it is good for community because when they have games you cannot park on the street it is good for us since it will bring us more together with our childred.

Response PH52-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH53 – Irine Andalon R.

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH53

Comment PH53-1 My name is Irinea and my comment is about this project, which would damage our area's [illegible]. The traffic issue would persist and the children's playground parks would be over.

Response PH53-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment PH53-2 We would not like this to happen in a place where we have lived for 50 years at the same address.

Response PH53-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH54 – Jeremiah Arriaga

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH54

Comment PH54-1 I support the gondola and think it's a good idea to help clear the traffic up in the city. I think it would also be very nice to see the city while on it, and is eco friendly.

Response PH54-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH55 – Jonathan Berman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH55

Comment PH55-1 Crowd control 10k plus people getting in + out

Response PH55-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH55-2 Private public who is the private co?

Frank McCourt who bankrupt Dodgers

Eventually to be paid for by taxes

Beginning of development of stadium as 'Doger Mall'

Response PH55-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly segmented or "piecemealed" from a larger development project at the Dodger Stadium property.

Comment PH55-3 Environmental review

Response PH55-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH56 – Bryn Lindblad

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH56

Comment PH56-1 Very excited about this project!

I hope the elected officials / Metro Board do everything in their power to help this project along. The sooner it's in operation, the better.

Response PH56-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH56-2 The project team has already done extensive community engagement and adjusted the scope of the project according to what they heard (e.g. extra station in Chinatown).

Now it's time to cheer this project along and get it done! I wholeheartedly support this project.

Response PH56-2 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities.

Public Hearing Comment PH57 – Alma R. Melgoza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH57

Comment PH57-1 I think it would bring many benefits, like:

1. It would create jobs.
2. It would reduce traffic a little bit (Dodgers).
3. It would be a tourist attraction.

Response PH57-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH58 – Lynn Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH58

Comment PH58-1 Great project to promote Local Business grow,

and provide visitors far and near.

Improve families connection, Brig people together in positive synergy.

I, We support this project.

Response PH58-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH59 – Patrick Paul Gallego II

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH59

Comment PH59-1 Would love to support out community by garunteeing a well designed stadium so that not only the fans get excited.

Response PH59-1 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH59-2 But, add another NFL team to Dodgers Stadium. Thanks in advance for your support.

Response PH59-2 This comment is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH60 – Lynn Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH60

Comment PH60-1 I support this project.! We support this project.

Great project to promote Local Business grow and bring visitors, far and near.

Response PH60-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH60-2 Improve families connection, Bring people together In positive synergy.

Response PH60-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH61 – Esperanza Andrade

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH61

Comment PH61-1 The Gondola Project does not bring benefits to our people and communities.

Response PH61-1 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH61-2 These are lies, that it will replace more vehicles going to the Dodger Stadium. The Gondola Project will impact our community.

Response PH61-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with RTP/SCS, as the proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities, and would otherwise reduce greenhouse gas emissions by reducing VMT.

Comment PH61-3 I do not agree with this project because they do not think about our people, but their own benefit. Let's fight so it is not made.

Response PH61-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH61-1 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Public Hearing Comment PH62 – Sophat Phea

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH62

Comment PH62-1 Hi, I grew up in Chinatown since I was 2 years old and I still live in Chinatown today. As there's been a rise of development and gentrification in Chinatown, I fear this Aerial Rapid Transit will contribute to it and my home won't be the same anymore.

Response PH62-1 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH62-2 I personally don't see myself using it and would love the money and effort to go toward more to what the community would use instead such as our public transportation.

Response PH62-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor

and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH62-3 It also looks like it'll take up a lot of parking in Chinatown where ppl already having trouble finding. It's been a huge barrier to the small businesses in Chinatown. Money and effort could've been put into improving the parking situation instead.

Response PH62-3 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment PH62-4 At the end of the day, who does it really benefit and who is being harm??

Response PH62-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close

to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Public Hearing Comment PH63 – Teri Vanderberg

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH63

Comment PH63-1 There is transportation to the Dodger game its FREE and it's a bus here at the train station.

Response PH63-1 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment PH63-2 I live here in Chinatown we don't want our parks peace disturbed by loops of people getting on a gondola.

Response PH63-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station, and queues would therefore be accommodated within the Station, given this lesser boarding demand and the larger queuing capacity at the Station.

Comment PH63-3 The pollution traffic and commercial circus of this will change Chinatown

Response PH63-3 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in

traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH64 – Rebeca Ocegueda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH64

Comment PH64-1 As a resident of North East Los Angeles, I oppose the Gondola, since it will affect our community, our historical park and Chinatown's community.

Response PH64-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH64-2 through PH64-3.

Comment PH64-2 It will impact rent increases and evictions, because many of us cannot pay, and it will increase the number of homeless people due to the increases that we will have.

Response PH64-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH64-3 This project would only fill up the pockets of Mr. McCourt, who is the most interested in it. But he does not think about us, the people who will be affected. This gondola will increase air pollution because of vehicle emissions in an area [cont.] that is already overloaded with air emissions.

Response PH64-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion

in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH64-4 This project is all lies, let's not be deceived.

Let's say NO to the Gondola.

Response PH64-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH65 – Julie Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH65

Comment PH65-1 As a taxpayer and resident in Chinatown I am opposed to the Gondola project.

Response PH65-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH65-2 Displacing the parking lot at dodger Stadium to send the CARS DOWN TO Chinatown and the Historic State Park will be ruined. Seniors will be run over by cars –

Response PH65-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive

recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Comment PH65-3 Disease will be spread.

Response PH65-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH65-4 All for Frank McCourt to have recurring income.

Response PH65-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH66 – Jose Estrada

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH66

Comment PH66-1 My comment is that any natural alteration has consequences on the environment. Therefore, I am against the project, because we will have consequences in terms of air and soil pollution, and pollution affecting birds and people.

Response PH66-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.3, Air Quality, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils with implementation of Mitigation Measures GEO-A and GEO-B. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant.

Public Hearing Comment PH67 – Maria Lemus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH67

Comment PH67-1 I support the Gondola Project.

I am a William Mead Homes Resident & having air transportation will significantly decrease traffic. It will also decrease the traffic and parking issues that we are currently experiencing with the events hosted at the state historic park.

Response PH67-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH68 – Monica Vazquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH68

Comment PH68-1 Hi my name is Monica Vazquez and I would love for you to pass this project. Aside from creating jobs, it will have a good impact on the community. There will be less polution, traffic jams. And it's a faster and safer way to get to the stadium. We all know how the stadium gets when theres a game with the Gondola Project it will minimize that problem.

Response PH68-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH69 – Joshua Neal

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH69

Comment PH69-1 I support the building of the LA ART project. As someone who frequently travels to LA to meet family as well as for work, taking cars off the street to reduce traffic, especially during high traffic periods such as game days is a very appealing prospect.

Response PH69-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH70 – Kevin Ho

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH70

Comment PH70-1 I believe the gondola is an excellent idea given that it will be properly maintained. Anything to reduce LA traffic is a great project.

Response PH70-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH71 – Maria Avila

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH71

Comment PH71-1 This project looks very good for the environment and all the community will benefit from this service. Thank you for thinking about the community.

Response PH71-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH72 – Andy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH72

Comment PH72-1 I was born and raised in LA and am a long time community member of Chinatown. I. my family, my neighbors and the people of LA do not need the gondola project.

Response PH72-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access.

Comment PH72-2 dodger stadium itself was an overinvestment that bulldozed over people's homes and the communities of La Loma, Bishop, and Palo Verde to exist. This project is yet another misuse of the people's collective time, funds, and energy.

Response PH72-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response PH72-1 for an overview of the need for the proposed Project.

Comment PH72-3 no one asked for or wants this project. There's already public transportation and shuttles that bring people specifically to Dodgers stadium. $25 million dollars for a limited worth and limited use project is an irresponsible use of funds when what we desperately need is better public transportation infrastructure.

Response PH72-3 Refer to Response PH72-1 for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH72-4 i and all my elderly and working neighbors should not have to wait one, two hours for the bus to get home, or anywhere. There is no hospital in Chinatown, because of gentrification many residents have to go to the USC hospital. The quickest route from Chinatown is 28 minutes by bus. 19 of those minutes is walking. People are elderly, disabled, living on $1000/month w/ a limited support network.

Response PH72-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. As discussed in Section 2.1, Overview of the Project, of the Draft EIR, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH72-5 put $125 mil more to eliminating transit fare, faster public transit, station hygiene, to bus shelters and real benches to affordable and free housing. I've noticed some bus shelters removed over the year, why, did installing hostile architecture to keep

unhoused people from laying down get too expensive? LA has seen too many harmful, displacing and gentrifying developments – it's insulting that the people behind LA ART try to mislead people into thinking this is a community good, to fool people into thinking this is good for us. We know better than that.

Response PH72-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH72-1 through PH72-4.

Public Hearing Comment PH73 – Samuel Maury-Holmes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH73

Comment PH73-1 I am very excited by this project. I have lived in NELA for ~8 years and have attended 10-20 Dodger games/year during that span. This will make my trips faster, cheaper, and produce less emissions. I will also start eating in Chinatown at local businesses instead of the Taco Bell Drive Thru on the way to the stadium.

Response PH73-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment PH73-2 This project is a huge net positive for Angelenos, including myself, my friends, and my neighbors. Cheaper, faster, and safer. Anyone familiar with gondolas knows that they are quieter, more fun, and pollute less than cars or buses.

Response PH73-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH73-3 I am happy that the draft EIR found no significant operating impacts, and that the project will remove thousands of cars per game – that means less pollution (aerial, noise) and safer walking for the nearby residents.

Go Dodgers!

Response PH73-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH74 – Mark Edwards

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH74

Comment PH74-1 Good idea to generate employment / income for Angelenos

Response PH74-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH74-2 This is a terroristic age (the many thought up ways to terrorize from ground to air)

Response PH74-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH74-3 Initialls to benefit attendance and revenue for dodgers stadium

Fair and reasonable fare for non-stadium riders

Response PH74-3 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment PH74-4 Is the pandemic expected to cease. Those aerial carts will carry more than one person.

Response PH74-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH74-5 If you are willing to do this for the L.A. Dodgers

What are you willing to do for God our creator (Jesus)

Response PH74-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH75 – Julie Chow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH75

Comment PH75-1 I don't want the Gondola in Chinatown. It affects all residents. What can we do if we want to build houses? It's better to build a subway than a gondola. Don't build a gondola in Chinatown. I'm opposed to it. I strongly oppose this approach. Please respect Chinatown residents. Stop the project. You can build subway, bus projects instead.

Response PH75-1 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways.

Public Hearing Comment PH76 – Hugo Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH76

Comment PH76-1 I oppose the Gondola Project that is truly intended to create revenue for a private wealthy developer.

Response PH76-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH76-2 It will not improve mobility at all and is not the identified preferred alternative contained in the DEIR.

Response PH76-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the

Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH76-3 A gondola will ruin the open space asthetic and not allow for users to relax and escape the urban/environment. It's a CEQA violation.

Response PH76-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. To the extent this comment raises concerns about impacts to the Los Angeles State Historic Park, refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH76-4 It won't benefit the community. The DEIR calls for using/upgrading the rapid bus system.

Response PH76-4 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to

complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Response PH76-2 for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives.

Comment PH76-5 We don't want to see a commercial retail/mall project – expansion of LA Live.

Response PH76-5 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Public Hearing Comment PH77 – L. Spangler

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH77

Comment PH77-1 I looked at considered the exhibits pro Angola. I am convinced this a McCourt/Dodgers Stadium private thing not public transportation. It is a tourist attraction sitting on our neighborhood and over our pants. It should not be built

Response PH77-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating hours, operating daily to serve existing residents, workers, park users and visitors to Los Angeles.

Public Hearing Comment PH78 - Zhao Can Guan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH78

Comment PH78-1 I'm strongly opposed to the gondola project in Chinatown. The gondola route will affect Chinatown's future development. Therefore, I'm strongly opposed to the gondola project in Chinatown.

Response PH78-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer also to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH79 – Matt Hebermehl

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH79

Comment PH79-1 I am opposed to the gondola project. I think that it will negatively impact the neighborhood and California State Historic Park. I also think that it is a waste of public fund, especially since metro already provides a shuttle service from Union Station.

Response PH79-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Responses to S2 regarding the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents,

employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH80 – L Meza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH80

Comment PH80-1 I don't support the gondola. It's a waste of public money, public space and the public's will. It's wrong. It's a sin. Think about that.

Response PH80-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Public Hearing Comment PH81 – Gigi Droesch

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH81

Comment PH81-1 We do not need a new tourist trap in Los Angeles! We need to prioritize working class angelenos and projects that will benefit them and not wealthy developers.

Response PH81-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH82 – Philip Murphy

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH82

Comment PH82-1 From what I've read and understand LA Arts claims that the Gondola is going greatly decrease traffic in and out of Dodgers Stadium as well as reduce air pollution is greatly exaggerated! The Gondola + McCourt's plans to put a shopping mall at Dodgers Stadium will increase traffic 365 days a year!

Response PH82-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit,

a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH82-2 Why not increase E-buses from Union Station to Dodgers Stadium, which will be less expensive and more efficient? The Gondola is going negatively impact the LA Historic Park and the neighborhood.

Response PH82-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment PH82-3 It is more of a tourist attraction than anything else to help promote McCourt's proposed shopping mall at Dodger Stadium.

Response PH82-3 Refer to Response PH82-1 for an overview of the need for the proposed Project and how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH83 – Mark McRae

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH83

Comment PH83-1 1) You don't own the sky. You cannot overpass people's property.

2) Security. People fight after every Dodgers game, remember Brian Stow. What kind of altercations could occur in every gondola.

3) If people are not driving, they are more likely to get more drunk – and become more aggressive fighting inside Gondola.

4) So much easier to have more shuttle buses to stadium.

Response PH83-1 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. Refer also to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to

meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Public Hearing Comment PH84 - Margaret Fong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH84

Comment PH84-1 Opposing gondola

I'm a resident near Broadway proposed gondola junction

There are no benefits for our community. Basically it is for McCourt financial gain only!

Response PH84-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH85 – Olali Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH85

Comment PH85-1 Dislike – placement of gondola, would be better in Playa del Rey.

Response PH85-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH85-2 Dislike – parking analysis – only 2 lots, that may not last at all. They are already occupied

Response PH85-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH85-3 Dislike – Esthetics, ugly, non-complimentary

Dislike – Cultural trauma of the proposed location

Dislike - $30 ride ticket

Response PH85-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH86 – Sakae Koyama

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH86

Comment PH86-1 ELYSIAN PARK AS THE OLDEST AND SECOND LARGEST CITY PARK IN LOS ANGELES HAS HISTOICALLY BEEN TARGETED BY DEVELOPERS WHO SEE OPEN PARK SPACE W/ DOLLAR SIGNS IN THEIR EYES. ELYSIAN PARK WAS TARGETED FOR A CONVENTION CENTER, A SMALL AIRPORT, AND HOUSING AMONG OTHER THINGS. KEEP GREEN SPACE OPEN. NO GONDOLA. NO TO FRANK MCCOURT. NO TO DODGER DEVELOPMENT.

Response PH86-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Public Hearing Comment PH87 – Norvan Gorgi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH87

Comment PH87-1 The gondola is a stupid, stupid idea. It's obvious that this is not an EIR, it is an advertisement. Just build some damn stairs and sidewalk.

Response PH87-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The Draft EIR complied with CEQA's requirements, providing the necessary analysis to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment PH87-2 Can there be a guarantee that LA ART won't institute a "fast-pass" system where you won't be able to pay to jump the queue?

Can there be a guarantee that LA ART give all riders equal service for one flat rate, as in just one standard fare for one type of service (similar to public transit)?

Response PH87-2 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Public Hearing Comment PH88 – Guilmar Perdorno

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH88

Comment PH88-1 The gondola is so ugly. The wires, the towers and the disturbance to the sky makes this project a FLOP

Stop the Gondola project because it does not need to exist. Use current infrastructure.

Response PH88-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Public Hearing Comment PH89 – Elizabeth

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH89

Comment PH89-1 I'm concerned with where people who are riding the Gondola will park. Where will the gondola riders park? You are removing, or planning to remove a parking lot at Union Station.

Response PH89-1 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. Metro's planned Forecourt would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space.

Comment PH89-2 Also, please address the Writ of Mandate from the California Endowment. Please address Metro using the office of Extraordinary Innovation to get around publicly sharing information.

Response PH89-2 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-

day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH89-3 Finally, how will this be funded?

Response PH89-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Public Hearing Comment PH90 - Robert Villagomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH90

Comment PH90-1 No Gondola! Chinatown for the people. This will displace more people and is a big waste of space, energy, and money.

How can development into a natural park be good for the environment by disrupting animal migration and their peace, damaging our biodiversity that is losing here and more space.

Response PH90-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH90-2 Displacement is death. City should protect people.

Response PH90-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Public Hearing Comment PH91 – Aaron Thomas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH91

Comment PH91-1 AS A RESIDENT WHO LIVES ON NORTH BROADWAY (IN THE PROJECT AREA) I HAVE CONCERNS ON THE FOLLOWING TOPICS:

Response PH91-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH91-2 through PH91-11.

Comment PH91-2 AESTHETICS – WILL HAVE A NEGATIVE IMPACT ON THE VIEWSCAPE OF THE AREA

Response PH91-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including impacts to the viewshed, which would be less than significant. Regarding scenic vistas specific to the North Broadway area identified by this commenter, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment PH91-3 AIR QUALITY – CONSTRUCTION OF THE PROJECT WILL WORSEN THE ALREADY POOR AIR QUALITY BY INCREASING TRUCK/VEHICLE IDLING

Response PH91-3 The Draft EIR addressed air quality in Section 3.03 Air Quality with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR. As discussed on page 3.03-21 through 3.03-22 and page 3.03-24, construction activities would not exceed applicable mass emissions or localized thresholds on worst-case construction days and air quality impacts would be less than significant.

Comment PH91-4 BIOLOGICAL – PROJECT WILL IMPACT WILDLIFE THAT USE ADJACENT NATURAL OPEN SPACE, INCLUDING THE L.A. RIVER

Response PH91-4 As discussed in Section 3.04, Biological Resources, of the Draft EIR, under CEQA, a project would have a substantial impact on biological resources if it would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Further, as

discussed in Section 3.04, with supporting evidence provided in Appendix E, Biological Resources Assessment, of the Draft EIR, and as confirmed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, construction of the proposed Project would result in less than significant impacts to special-status species with mitigation, and operation of the proposed Project would result in less than significant impacts to special-status species. The proposed Project BSA has been completely disturbed during urban development and consists of roadways, sidewalks, buildings, and rail tracks. Therefore, habitats preferred by special-status wildlife species are not present within the BSA. The Los Angeles River, which is contained in a concrete channel through the downtown Los Angeles area, is approximately 0.4 to 0.6 mile east of the BSA, and serves as a wildlife movement corridor through the heavily urbanized downtown area; however, it occurs outside the BSA. Additionally, there are no wildlife movement corridors between the BSA and the river that could promote movement between areas. As such, the proposed Project would not impact the Los Angeles River, and would not impact any special-status species that may utilize the Los Angeles River.

Comment PH91-5 CULTURAL – PROJECT WILL DISTURB HISTORIC AND CULTURAL ELEMENTS SUCH AS THE ZANJA MADRE AND NATIVE SITES

Response PH91-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation, including impacts to the Zanja Madre.

Comment PH91-6 NOISE – PROJECT CONSTRUCTION WILL CREATE MORE NOISE IN SURROUNDING NEIGHBORHOODS INCLUDING THE STATE PARK

Response PH91-6 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts from the proposed Project. Construction noise impacts associated with the proposed Project were analyzed in the Draft EIR both for noise from on-site construction activities, meaning the noise from construction activities at each station, tower, and junction, and for off-site construction noise. Tables 3.13-17 and 3.13-18 on pages 3.13-35 to 3.13-45 of Section 3.13, Noise, of the Draft EIR, show the locations where on-site construction noise impacts would occur during each phase of construction of the proposed Project, based on the L.A. CEQA Thresholds Guide and FTA analysis methods. As detailed therein, on-site construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a

Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. As demonstrated on Table 3.13-21 and explained on pages 3.13-51 to 3.13-52 of Section 3.13, Noise, of the Draft EIR, off-site construction traffic noise impacts would be less than significant during all phase of construction of the proposed Project. Refer to Section 2.08, Construction, in Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project.

Comment PH91-7 PARKS – PROJECT WILL IMPACT THE USE OF AND AESTHETICS OF THE LA STATE HISTORIC PARK (WHICH WAS CREATED BY AND FOR THE COMMUNITY)

Response PH91-7 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment PH91-8 POPULATION/HOUSING – THIS PROJECT MAY BE INTENDED TO FACILITATE THE FURTHER DEVELOPMENT OF THE PARKING LOTS AT DODGER STADIUM, WHICH ARE OWNED BY FRANK MCCOURT.

Response PH91-8 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response L,

Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH91-9 THIS USE OF PUBLIC FUNDS TO SUPPORT A PRIVATE INTEREST AT THE EXPENSE OF THE LONG TERM SUSTAINABILITY OF THE EXISTING LOCAL COMMUNITY IS UNACCEPTABLE.

Response PH91-9 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH91-10 THE MARKET RATE HOUSING AND COMMERCIAL DEVELOPMENT INTENDED FOR THE DODGER STADIUM PARKING LOTS WOULD CERTAINLY LEAD TO THE DISPLACEMENT OF THOUSANDS OF LOCAL RESIDENTS DUE TO INCREASE RENT AND PROPERTY VALUES. IT WOULD EFFECTIVELY BE A REPEAT OF THE CHAVEZ RAVINE TRAGEDY THAT PRECEEDED THE CONSTRUCTION OF THE STADIUM.

Response PH91-10 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes

an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Further, the Dodger Stadium property is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated by commenters. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH91-11 THAT THE INTENTIONS OF THE DEVELOPERS ARE NOT BEING CONSIDERED IN THIS EIR SHOWS THE DISSHONEST AND MALICIOUS NATURE OF THIS PROCESS AND IT SHOULD BE DISCREDITTED. I DEMAND THAT THE FUTURE USE AND DEVELOPMENT OF THE DODGER STADIUM PARKING LOT PROPERTIES (THE REAL OBJECTIVE OF THE GONDOLA) BE STUDIED AND CHALLENDGED IN THIS EIR.

Response PH91-11 Refer to Section 2.0, Project Description, of the Draft EIR, for a description of the proposed Project, an aerial gondola system intended to be the first permanent transit connection to one of the region's most visited venues. Refer to Response PH91-10 for discussion of how the proposed Project solely proposes an aerial gondola system.

Public Hearing Comment PH92 – Darlene Escobedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH92

Comment PH92-1 I am writing the comment to oppose the construction of the Gondala project.

Response PH92-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH92-2 I am concerned about the impact on housing affordability in the area and potential displacement of long time residents. This does not appear to be neither an efficient or viable effort to effectively address transportation needs in the area.

Response PH92-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los

Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment PH92-3 The parking study does not seem to adequately address the impact increased demand would have on locally residentially zoned areas. Incentivizing businesses to provide parking packages appears like an appeal to further alienate and endanger the longevity of the historic businesses already existing that actually serve the local community.

Response PH92-3 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Public Hearing Comment PH93 – Katty Rodriguez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH93

Comment PH93-1 Public land should be used for public good! The LA State Historic Park and the parcels slated for the proposed towers are all public land.

Response PH93-1 This comment is noted and will be provided to the decision makers for review and consideration. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park.

Comment PH93-2 Private interest should not be coming into the neighborhood to profit off of us. Chinatown is in an affordability crisis. This is a working poor community that does not need the gondola.

Response PH93-2 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the

proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH94 – Helen Villagomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH94

Comment PH94-1 I oppose the Gondola, it doesn't provide a true community service. It is not public transportation.

Fee to ride is absurd. Waste of $.

CDI – should not support and public funds should not be utilized.

Don't threaten the State Historic Park w/ the construction of this thing.

Response PH94-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed

Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Public Hearing Comment PH95 - Elva Yanez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH95

Comment PH95-1 I am a former LA State Parks + Recreation Commission. The LA State Historic Park was the result of one of the foremost environmental justice campaigns in LA history.

Response PH95-1 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park.

Comment PH95-2 The effort to build the park involved an environmental impact report that DID NOT cover the construction of a gondola hence the gondola is a CEQA violation. There mere 65 public meetings in advance of construction of the park – none which involved discussion or mention of the gondola. Again, this is a violation of CEQA – the state's primary environmental quality law. It would be a travesty if the gondola is built over LA State Historic Park.

Response PH95-2 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. The Draft EIR includes the potential effects associated with construction and operation of the proposed Project, including the portion in the Los Angeles State Historic Park. Detailed analysis is provided in Chapter 3.0, Environmental Impact Analysis. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Refer to Topical

Response F, Los Angeles State Historic Park, for a discussion of the legal framework that allows the California Department of Parks and Recreation to permit the proposed Project's use of Los Angeles State Historic Park. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Public Hearing Comment PH96 – Eugene Pesileon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH96

Comment PH96-1 We don't need a Gandola. We don't need more people displaced from their homes & more money spent on projects that displace more people our of their homes when we have so many countless issues that are more pressing & that demand our attention & resources. This project would mean more money spent on projects that, quite frankly, the residents of this city do not need. We need more money going into housing, houselessness, education, transportation, & infrastructure – what we don't need is a vanity project for the McCourt family that doesn't help anyone other than them & their teams. DO NOT SUPPORT & BUILD THIS PROJECT!

Response PH96-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH97 – Eleanor Bray

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH97

Comment PH97-1 I have called Los Angeles my home for 7 years. I am deeply concerned by the LA ART Gondola Project. The problems this gondola will "solve" does nothing to actually solve them.

Response PH97-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH97-2 There has been no community input, it will waste taxpayer $$, and cause more gentrification. We cannot allow billionaires to use LA as their play place.

Response PH97-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH98 – Luke Braidizzle

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH98

Comment PH98-1 Gondola seems neat but LA needs some real public transit

Response PH98-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH99 - Huang Li Wei

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH99

Comment PH99-1 We are strongly opposed to the gondola project over Chinatown. The gondola does not provide any benefits when passing through Chinatown. It's a common nuisance to Chinatown. It's all harm but no benefit. It limits Chinatown's future development. I'm a Chinatown resident. Some people just want to ride the gondola to the mountain park, but it doesn't need to pass over Chinatown.

Response PH99-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Public Hearing Comment PH100 - Nazaro Arreola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH100

Comment PH100-1 I am a resident of Lincoln Heights and I am in favor. This is because I have a business and I think this would benefit all of us.

Response PH100-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH101 – No Name Given

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH101

Comment PH101-1 I believe that this can have a positive impact for the community. Based off what I have heard this feels like it can be a positive impact for our community. It can help the environment too!

Response PH101-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH102 – Chance Menendez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH102

Comment PH102-1 I believe that to have better public transport we need to accept more forms of it and not supporting the gondola because its not bikes or sidewalks is misguided. I support the gondola and believe it will help the city and public transportation.

Response PH102-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH103 - Zhu Yue Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH103

Comment PH103-1 I object to certain financial groups building a gondola above Chinatown, seeking to occupy the space above. If it is done, Chinatown will lose all possibilities of future development. It has no benefit to Chinatown. I strongly oppose it.

Response PH103-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH104 - Wei Lian Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH104

Comment PH104-1 I strongly oppose building a gondola above Chinatown.

Response PH104-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH105 – Bin Xie

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH105

Comment PH105-1 We strongly oppose certain financial groups building a gondola above Chinatown, seeking to occupy the space above. If it is done, Chinatown will lose all possibilities of future development. It has no benefit to Chinatown. We strongly oppose it.

Response PH105-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH106 - Wu Coi Xia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH106

Comment PH106-1 I strongly oppose building a gondola above Chinatown. It has no benefit to Chinatown.

Response PH106-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH107 - Qi Guang Chen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH107

Comment PH107-1 We are strongly opposed to the gondola project in Chinatown. It will occupy Chinatown property. It does not have any economic development benefit. I hope they can accept our feedback.

Response PH107-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Public Hearing Comment PH108 - Wei An Jhu Yen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH108

Comment PH108-1 We are strongly opposed to the gondola project in Chinatown. It will occupy Chinatown property. It does not have any economic development benefit. I hope they can accept our feedback.

Response PH108-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Public Hearing Comment PH109 - Caritina Caro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH109

Comment PH109-1 We would like the gondola to be built because there is not enough parking and people come from other places, so we, the people who live here, cannot find parking.

We also like it because it will provide a beautiful view, which will look very nice.

Response PH109-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH110 – Grace Bryant

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH110

Comment PH110-1 THIS PROJECT IS CLEARLY A VANITY PROJECT FOR THE CITY AND A SCHEME BY FRANK MCCOURT. ANY SUGGESTION THAT THIS GONDOLA SERVES AS AN EXPANSION OF PUBLIC TRANSIT IS A LIE. THE AREA SERVED BY THIS GONDOLA IS MISSING SIDEWALKS, BIKE LANES, & BUS SERVICE IN ANY SUFFICIENT CAPACITY. LA METRO SHOULD INVEST IN ITS PUBLIC INFRASTRUCTURE & ADVOCATE FOR THE PEOPLE OF LA, AGAINST MILLION/BILLIONAIRES LIKE FRANK MCCOURT. THIS IS A SHAME.

Response PH110-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Topical Response C, Project Features, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH111 - Mary Areola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH111

Comment PH111-1 I would like this project because it would help parking availability, because sometimes I can't find parking.

Response PH111-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH112 - Luis Herrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH112

Comment PH112-1 This is a very engaging project and it looks very nice. But I feel that there is no need to carry out this project because it looks like it is going to benefit the Dodger Stadium only. I think that this project is just an attraction for touristic purposes.

Response PH112-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/ State Park Station. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH113 - Yi H

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH113

Comment PH113-1 Object.

Response PH113-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH114 - Amy Tang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH114

Comment PH114-1 I support this. Gondola transit will provide citizens with convenience, grow LA's economy, and create a tourism attraction for LA.

Response PH114-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH115 - Chiu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH115

Comment PH115-1 Object

Response PH115-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH116 - H Wu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH116

Comment PH116-1 Object

Response PH116-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH117 – Liam Ncc

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH117

Comment PH117-1 Object

Response PH117-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH118 - Jesus Leija

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH118

Comment PH118-1 I think the community needs to be listened to, and a more precise Benefit and Impact Evaluation needs to be provided. Thank you.

Response PH118-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and

Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Public Hearing Comment PH119 - Zhou

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH119

Comment PH119-1 Object

Response PH119-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH120 - Ne Hueng Ho M

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH120

Comment PH120-1 Object

Response PH120-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH121 - Kai M Fong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH121

Comment PH121-1 Oppose the Gondola

Response PH121-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH122 - Sharon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH122

Comment PH122-1 Object

Response PH122-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH123 – Yun Hoc Thai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH123

Comment PH123-1 Oppose the Gondola

Response PH123-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH124 - Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH124

Comment PH124-1 Object.

Response PH124-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH125 – Li Yi Ye

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH125

Comment PH125-1 I strongly oppose building a gondola above Chinatown, as the construction of suspension cables will definitely affect the development of Chinatown. Thus we strongly oppose it. Object.

Response PH125-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer also to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH126 – Xiao

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH126

Comment PH126-1 Object.

Response PH126-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH127 – Yue Xian Fang

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH127

Comment PH127-1 I strongly oppose building a gondola above Chinatown, as the construction of suspension cables will definitely affect the development of Chinatown. Thus we strongly oppose it. Object.

Response PH127-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Public Hearing Comment PH128 – Rhio Shen Hu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH128

Comment PH128-1 I support the gondola project. It will provide citizens with convenience, grow LA's economy, and bring a lot of tourists.

Response PH128-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH129 – Wei Han Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH129

Comment PH129-1 The gondola will get in the way of Chinatown's future development.

Response PH129-1 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH130 – Illegible Name

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH130

Comment PH130-1 We are strongly opposed to building the gondola in Chinatown. We are strongly opposed to it.

Response PH130-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH131 – Jennifer Ly

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH131

Comment PH131-1 It is absolute disgrace that this project ever reached this stage. None of the affected communities were ever consulted in any meaningful way.

Response PH131-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding communities.

Comment PH131-2 Additionally, the developers have failed to provide important information about this vanity project's safety, long-term operation costs, and budget.

Response PH131-2 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and

Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH131-3 Additionally, the environmental impacts of this project are terrible. It does not alleviate traffic nor improve are terrible. It does not alleviate traffic nor improve quality of life of any residents. There are already transit options in place that are more effective than this ridiculous gondola.

Response PH131-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment PH131-4 This is an exercise of greed and corruption. In no way shape or form is the gondola beneficial for Los Angeles. Do not move forward with this project unless you want a legacy of destruction and violence.

Response PH131-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to

Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Public Hearing Comment PH132 – Illegible Name

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH132

Comment PH132-1 We are strongly opposed to the gondola project. Do not allow the gondola to be built over Chinatown.

Response PH132-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH133 – Shu Ma

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH133

Comment PH133-1 Support the Gondola.

Response PH133-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH134 – Lucy Petrow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH134

Comment PH134-1 I am against the Gondola.

The Gondola will not take cars off of the road, N is a waste of taxpayer $$$

The result is gentrification.

I do not support using public resources for private profit.

81 home games – come on! No way.

Response PH134-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding

communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH135 – Po Wang Knan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH135

Comment PH135-1 Support the Gondola.

Response PH135-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH136 – Chi Jing Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH136

Comment PH136-1 Once the Gondola is built, it will get in the way of Chinatown's future development.

Response PH136-1 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Additionally, refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Public Hearing Comment PH137 – Yang Luong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH137

Comment PH137-1 An aerial gondola only benefit the rich. It has no benefits to poor people at all.

Response PH137-1 Refer to Topical Response N, Environmental Justice, for discussion of the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH138 – Illegible Name

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH138

Comment PH138-1 Oppose the Gondola in Chinatown. We are strongly opposed to it.

Response PH138-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH139 – Win Am Tim Hui

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH139

Comment PH139-1 We oppose having this aerial gondola through Chinatown.

Response PH139-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH140 – Hui Qiang Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH140

Comment PH140-1 I strongly oppose building this aerial gondola in Chinatown.

Response PH140-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH141 – Albert Ho

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH141

Comment PH141-1 This project is a scam that only benefits Frank McCourt.

Response PH141-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH141-2 It will not relieve traffic at all around Dodger Stadium. It will increase overall traffic because this gondola isn't just being built for Dodger games. It will be used year-round for events at the stadium during the off-season, which means that the year-round traffic will increase overall. The community around the stadium will only suffer as a result.

Response PH141-2 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical

Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Public Hearing Comment PH142 – Allen Leon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH142

Comment PH142-1 I support construction. It will help Chinatown prosper and make transport convenient.

Response PH142-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH143 – Cerianne Robertson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH143

Comment PH143-1 This gondola project is NOT for residents, and must NOT be approved. The posters showing "impact" fail to take seriously the actual impacts this project will have on long-time working-class residents – gentrification, displacement, and the accelerated conversion of the area into a playground for tourists and a profit-making machine for Frank McCourt's family.

Response PH143-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH144 – Fatima Carrera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH144

Comment PH144-1 Time & time again we've witnessed how these multi-million dollar redevelopment projects prioritize those funding it rather than using & investing into the communities that will be directly impacted by this.

Response PH144-1 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH144-2 Something the EIR doesn't account for is how this will impact housing, displacement, and ultimately lead to more gentrification.

Response PH144-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing.

Comment PH144-3 We need to invest into resources that can be accessed by POC communities. Lets invest into hospitals, schools, better public transportation. A gondola will not improve traffic. Public land should be used for public good!!

Response PH144-3 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways,

thereby reducing associated air pollution and improving safety. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH145 – Xochitl Manzanilla

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH145

Comment PH145-1 My name is Xochitl Manzanilla and I oppose the gondola project for many reasons: we do not need it. We already have free transportation to Dodgers stadium, and it will be a big mistake doing it on areas where only low income families live.

Response PH145-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately

burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH145-2 It will affect terribly all the programs we have at LASHP like flying kite, farmers market, civic bike, and in the park, tai chi class, yoga class, baseball, and all concerts in the Park. People fought hard so this land will be the beautiful Park that it is today, and it's our beautiful LASHP

Response PH145-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Public Hearing Comment PH146 – Vivi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH146

Comment PH146-1 After careful consideration, and review of LA Arts claims about the benefits of the gondola, they do not solve the real issue of traffic in Chinatown while also potentially contributing to Chinatown's on-going gentrification. In an ideal world, I see the dream of people using this gondola. However the demand isn't there. People would have to use public transport to get to Union Station, which they don't do and still won't do unless it gets better. I live 2 blocks away. This would be an eyesore.

Response PH146-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 3.01,

Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, for discussion of how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Further, the Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Comment PH146-2 Lastly, it would be concerning to me that a private entity would claim to solve a public transportation issue. They must make a profit at the end of the day, and want to use my neighborhood's airspace to make a buck. Where is the money coming from? The LA Art team would not give me a clear answer, and I was very open to hearing their ideas for a solution. All in all, this seems to just be a means to make $$$ on our community's space under the fake guise of curbing traffic which UCLA Mobility Lab has already debunked.

Response PH146-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose.

Public Hearing Comment PH147 – Li Ping Ma

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH147

Comment PH147-1 I support the gondola.

Response PH147-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH148 – Yu Hue Chi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH148

Comment PH148-1 Support the Gondola.

Response PH148-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH149 – Ciro Avila

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH149

Comment PH149-1 This project is not neutral, since minorities are affected, including adjacent residents' privacy, and there will be more people moving in the community. Also, it is not fair that people take advantage for their own benefit by claiming that they are acting on behalf of the residents and the City of Los Angeles.

Response PH149-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project supports Metro's goal of prioritizing equity opportunities. Refer also to Topical Response C, Project Features, for discussion of how the proposed Project would provide privacy features and for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities,

including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH150 – Cui Lian Wu

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH150

Comment PH150-1 The gondola will not bring any benefits to Chinatown. It's all harm but no benefit.

Response PH150-1 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH151 – Wu Cui Xia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH151

Comment PH151-1 The gondola will limit Chinatown's future development.

Response PH151-1 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Public Hearing Comment PH152 – Jasmine Wang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH152

Comment PH152-1 I DO NOT SUPPORT THE LA ART / GONDOLA PROJECT. THERE IS ALREADY SUFFICIENT FORMS OF TRANSPORTATION TO DODGERS STADIUM INCLUDING THE GOLD LINE, DODGERS BUS, RIDESHARES, AND WALKING. THE LA ART / GONDOLA PROJECT PRIORITIZES THOSE WITH THE MOST POWER AND NEGATIVELY AFFECT THE LOCAL COMMUNITY RESIDENTS. MOREOVER, WE HAVE GREATER NEEDS THAN AN AERIAL TRAIN OVER US.

Response PH152-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Public Hearing Comment PH153 – Edwin Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH153

Comment PH153-1 WASTE OF MONEY. WILL NOT HELP RESIDENTS. IT'S A PRIVATE COMPANY THAT IS USING PUBLIC LAND FOR IT'S OWN BENEFIT. THE DRAFT EIR IS NOT OBJECTIVE. IT IS USED TO PROMOTE GONDOLA. CHINATOWN AND THE PEOPLE WILL NOT BENEFIT, IF PASSENGERS ARE FLYING OVER CHINATOWN, HOW WILL THE BUSINESS BENEFIT.

Response PH153-1 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Public Hearing Comment PH154 – Luke MacDonald

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH154

Comment PH154-1 I am against the gondola. Waste of money, doesn't make sense – how will it function effectively in the rush after a game?

Response PH154-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment PH154-2 Eyesore, gentrification project, privacy issue.

Response PH154-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become

opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Public Hearing Comment PH155 – Casa Wilson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH155

Comment PH155-1 I am vehemently opposed to the Gondola project! I don't want my tax money going to this nightmare. I don't want to lose half the greenspace of Angeles National Park! Dodgers Stadium already ruin our lives half the year. Now you want to bring traffic, congestion, and tourists to our homes year round! It's an absurd, corrupt project that will destroy the property values of everyone who owns a home here for what? To take a few people up to a baseball game? STOP THE GONDOLA!!

Response PH155-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors

drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Public Hearing Comment PH156 – Rachel Day

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH156

Comment PH156-1 I am opposed to the proposed gondola from Union Station to Dodgers Stadium. While traffic around Dodgers Stadium before and after games has always been significant, building permanent infrastructure is a misguided use of resources and is a myopic non-solution to the problem. I am in favor of expanding the already existing shuttle system that runs the same route. It's unfortunate that Metro has chosen to work with a private company to build transportation that will have lasting effect on multiple neighborhoods – Downtown, Chinatown, Echo Park – especially given the obvious conflicts of interest with Frank McCourt, his son, Dodger Stadium, and LA ART

Response PH156-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Downtown, Chinatown, and Echo Park.

Public Hearing Comment PH157 – Maria Elena Patino

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH157

Comment PH157-1 As a resident who cares about our community, especially our young people, I oppose this project. Anahuak has championed recreational areas for our children and families for years.

Response PH157-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH157-2 We know that each soccer field, each park is not enough, and we need more so our youngsters can enjoy sports.

Response PH157-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH157-3 The Gondola Project does not bring any benefits in terms of public transportation; it is a tourist attraction that will only benefit the ambitions of one single person, Frank McCourt.

Response PH157-3 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from Los Angeles Union Station and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and

special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH157-4 Don't waste money from our federal taxes on a project that won't do anything to keep our environment clean.

Response PH157-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH157-5 I am asking you to keep using the bus transit service from Union Station to the Dodger field. That is a system that has been very successful, and most importantly, it is FREE.

I am asking you to keep using the means of transportation that do work and don't waste money in such a way that benefits only one person.

Response PH157-5 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents,

employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Response PH157-4 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding. Refer to Response PH157-3 for discussion of the Project Sponsor.

Public Hearing Comment PH158 – Berta Avila

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH158

Comment PH158-1 This project will not help w/ traffic, it will not alleviate any of the many issues on the roads in L.A. and will only increase traffic in Chinatown.

Response PH158-1 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to a proposed Project's stations.

Comment PH158-2 How is this beneficial to the people of L.A.? It is certainly not beneficial for the environment – people will still drive their cars to the gondola stops and more cars will drive to Union Station.

Response PH158-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Response PH158-1 for discussion of how the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders.

Comment PH158-3 Please do not pretend this is public transit – it is a private development masking itself as a public project to access gov't dollars and to get the citizens of LA to foot the bill

for Frank McCourt, (or LA ART or Climate Resolve or whatever other shell organization is created).

Response PH158-3 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Public Hearing Comment PH159 – Katie Miles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH159

Comment PH159-1 I am an Echo Park / Chinatown resident, and I am very opposed to the Gondola. We need safe, reliable, frequent, and affordable public transportation in our neighborhood, that takes us where we need to go. The gondola is none of that. The gondola will hurt neighborhoods and will not meet our public transportation needs. I am very impacted by traffic for Dodgers Stadium, and the gondola won't make it any better. We need more buses!

Response PH159-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan.

Public Hearing Comment PH160 – Rebecca

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH160

Comment PH160-1 The Gondola will have negative lasting impact on the Chinatown community for generations to come. SHAME ON FRANK MCCOURT and the LA Dodgers Corp. for pushing a disgusting self-indulgent project with no regard for the community it affects. This public forum was a sham and your science fair was full of lies about the Gondola. STOP THE GONDOLA

Response PH160-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin,

and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Public Hearing Comment PH161 – Gabe Ross

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH161

Comment PH161-1 I am opposed to the gondola and its lack of transparency.

Response PH161-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Public Hearing Comment PH162 – Kevin Giron

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH162

Comment PH162-1 From what I saw and gathered from the information being communicated here, its clear that this project puts minimal effort in the quality of life of the people living in this community. The draft feels badly planned and exists solely to sap resources out of all Angelenos. Where is the inclusivity in the design of this project? All it targets is the money getting in peoples' wallets. This is a disgrace, plain and simple. Angelenos deserve better than what's being offered here. NO TO LA ART!

-From someone who lives here

Response PH162-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and supports Metro's goal of prioritizing equity opportunities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the

unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH163 – Kevin Lau

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH163

Comment PH163-1 I don't believe enough alternative solutions were explored. LA has such a strong car culture that is the primary deterrent to public transportation. I don't think the gondola is a long term solution. It'll be nice once or twice and never used again. I believe the Dodger Organization should be looking into more ways to accomodate their fans. Just like stores have to hire security to manage lines outside of their store. This shouldn't be a city problem.

Electrification of metro buses and incentivizing use of Dodger Express I think should be tried before committing to such a large project that impacts many. Creating more pick up points for fans. Alternative solutions should be enacted before committing to this.

Response PH163-1 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on

neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is

free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Public Hearing Comment PH164 – Jian Ai Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH164

Comment PH164-1 We strongly object to certain financial groups building a gondola above Chinatown, seeking to occupy the space above. If it is done, Chinatown will lose all possibilities of future development. It has no benefit to Chinatown. I strongly oppose it.

Response PH164-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH165 – Jess Gudie

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH165

Comment PH165-1 I'm a local resident and represent my neighbors and family on Eastlake Avenue and we are against the plans for a gondola. Money should go towards the community and not to accommodate the money making dodgers stadium |goers| end beneficiaries

Response PH165-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Public Hearing Comment PH166 – Lai Chiung Mi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH166

Comment PH166-1 I support the gondola. It will make transport convenient and help Chinatown prosper.

Response PH166-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH167 – Kun Goc Leon

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH167

Comment PH167-1 Support the Gondola. It will improve traffic and urban prosperity in Chinatown.

Response PH167-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH168 – No Name Given

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH168

Comment PH168-1 As a lifelong member

Response PH168-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH169 – No Name Given

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH169

Comment PH169-1 Gondola. Object.

Response PH169-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Public Hearing Comment PH170 – Santiago Vega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH170

Comment PH170-1 LAART is, in my opinio, a criminal mafia. Frank McCour paid his lackie Garcetti to push Metro to make Metro a devil's advocate. Garcetti got millions from McCourt in political contributions. And Metro Cory Zelmer is their donkey! I have copes of all the state records!

McCourt, Garcetti + Zelmer "the devil's handmaidens"!

Helga!

Response PH170-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH171 – Kevin Lau

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH171

Comment PH171-1 MR. LAU: All right. I just wanted to express concern about the gondola in Chinatown. There area lot of questions I don't think have been like really answered.

Economically, I'll ask, like how much will the project cost? How much will riders be charged? Will they be charged each way? I know top parking usually is $40 to $50 regularly over at Dodger Stadium.

Will the gondola be open during non-event days? Who would use it and why? Do they plan on holding other events up in the parking lot?

Response PH171-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system.

Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment PH171-2 I'm concerned for the businesses in Chinatown and Olvera Street that I think will be negatively affected by having less of a friction from Union Station up to the Dodger Stadium.

Response PH171-2 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH171-3 I don't want it to be just something like Angels Flight, some sort of like something stupid that's there.

Response PH171-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment PH171-4 Will air rights be negotiated for property owners that have the gondola over them?

Response PH171-4 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.05 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR.

Comment PH171-5 Environmental impact. I'm concerned about the positive, what they're saying about the traffic reduction. Because if they're just taking passengers from Union Station who would normally take the Dodger Express, are you really reducing any traffic? All right.

Response PH171-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium

draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The main VMT reduction benefit of the proposed Project would come from travelers shifting from driving to Dodger Stadium to taking transit. The VMT change associated with some riders who park and ride rather than park at Dodger Stadium are factored into the analysis but are minor in their effect given the proximity of the Union Station and Chinatown areas to Dodger Stadium. Additionally, the VMT benefit associated with existing Dodger Stadium Express ridership are already accounted for in the calculations of existing Dodger Stadium VMT. The Draft EIR estimates the proposed Project's net benefit from existing conditions. The shift of riders from Dodger Stadium Express to the proposed Project would not result in a change in Dodger Stadium VMT, and the EIR accurately does not assign any VMT benefit associated with this potential shift from one mode of transit to another.

Comment PH171-6 What are the carbon emissions that will be used to build the gondola system? All right. How many passengers have to use the gondola in order to offset the carbon produced in order to build the gondola?

Response PH171-6 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's construction emissions and ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. For the purposes of the GHG analysis, the Draft EIR followed industry standard practice in CEQA documents and SCAQMD guidance to assume a 30-year project life for purposes of amortizing construction GHG emissions, such that construction emissions can be considered together with the operational emissions. This approach is described in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. Overall, the proposed Project's benefits to air quality and greenhouse gas emissions are expected to increase over time.

Comment PH171-7 Safety. Definitely, especially with the past week with the amount of rain we had, there's a lot of soil instability.

Response PH171-7 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measures GEO-A.

Comment PH171-8 And then, let's see. I don't see any, I haven't seen any third-party independent data that states if it supports this is a good idea. Are there any? Can that be provided? All right?

Is there any data about Dodger fans or people in Chinatown that want this?

Response PH171-8 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[2] Stantec is an internationally respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed

[2] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment PH171-9 I think we need to focus more on affordable housing or getting a supermarket.

Response PH171-9 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment PH171-10 Let's see. I don't think I have enough time for anything else. It's like two seconds. I just wanted to make a closing. Oh, okay.

So, a lot of my research says that the '84 LA Games of the Olympics was one of the most successful Olympics ever, and a lot of that was because it did not lose any money. But, more importantly, it revitalized the urban core of the cities, but not at the expense of its residents. And I feel as if this is just a plan that's being pushed without actually taking into account the actual people affected by this being built in our community.

And I just want these – I want these answers, as a resident.

Thank you.

Response PH171-10 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project

features. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Public Hearing Comment PH172 – Kathleen Johnson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH172

Comment PH172-1 MS. JOHNSON: My name is Kathleen Johnson, K-A-T-H-L-E-E-N J-O-H-N-S-O-N. My name is Kathleen Johnson, Executive Director of the nonprofit LA River State Park Partners, the support organization for LA State Historic Park.

A gondola through LA State Historic Park would significantly alter the park's southern and middle sections and their mature native landscapes and compromise users' experience of the peaceful, quiet, open land and skies of the entire park.

Response PH172-1 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment PH172-2 Taking public parkland for a looming station building and 98-foot tower, the route would convey cars just 26 feet overhead on six massive cables. The gondola would destroy 81 mature trees, permanently alter the park's thoughtfully-designed vistas, jeopardize event revenues and vital maintenance, and threaten historic features.

Response PH172-2 Refer to Response PH172-1 for discussion regarding the ability of uses to continue at the Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic

views would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment PH172-3 These major park impacts, grossly underexamined in the Draft EIR, represent an environmental injustice. The park was born from community activism that transformed a former rail yard brownfield into an urban green oasis – with all of the related health and community benefits. After this long struggle, residents deserve to have their original designs and uses for the park respected and their land protected.

Response PH172-3 Refer to PH172-1 for discussion regarding the ability of uses to continue at the Park. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park.

Comment PH172-4 I'm not here to comment on the wisdom of the gondola enterprise, but simply to insist that taxpayer-funded public parkland not be commandeered for its use.

Thank you.

Response PH172-4 This comment provides a general conclusion regarding the comments raised in the letter. Responses to the comments contained in this letter are provided above in Responses PH172-1 to PH172-3.

Public Hearing Comment PH173 – Olivia Viera

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH173

Comment PH173-1 I'm a resident of Solano Canyon, which is east, adjacent to Dodger Stadium. So, I've been affected by the traffic for the last 22 years.

I'm also the founder of a community arts organization called Indigenous Wellness Collective, which serves hundreds of BIPOC folks in the area.

Response PH173-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH173-2 There is a lot of trauma in this area going back to the era of my great uncle, Tony Montez, who was displaced when the Dodgers moved from Brooklyn to Los Angeles. His family was robbed of housing.

So, I'm distinctly aware of the trauma in the area regarding government or big corporations moving in and making decisions for the community that directly affect the community.

Response PH173-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including

an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH173-3 One of the best things that has happened so far is the Metro non-gas buses coming in and bringing hundreds of people to the stadium. This has relieved traffic immensely, although I realize there are some improvements that need to be made there.

Response PH173-3 While many Dodgers Stadium Express riders may choose to ride the proposed Project to take advantage of the much quicker travel time and frequent service, the average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845). In addition, while funding sources for Dodger Stadium Express are not known beyond the 2023 season, the proposed Project would not preclude the continued operation of the Dodger Stadium Express, which would provide further transit capacity to Dodger Stadium.

Comment PH173-4 The gondola is offensive to the neighborhood of Chinatown, Solano Canyon, Echo Park, and Lincoln Heights. It is blatant capitalist greed.

If the gondola were a free ticket, I would reconsider my position. But, as of now, I stand 100 percent against the construction of this gondola in this part of the city. I would like to see it overlooking the marina instead.

Thank you.

Response PH173-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH173-2 for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding communities and how the Draft EIR addresses environmental justice. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and

special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH174 – Melissa Arechiga

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH174

Comment PH174-1 Okay. My name is Melissa Arechiga. I stand here before you as a representative of surviving families that were vitally evicted from Palo Verde, La Loma, and Bishop, three Mexican indigenous communities that were destroyed to build Dodger Stadium.

I am here today opposing the gondola project from Union Station to Dodger Stadium. While this may be exciting to some, it is a sign of change, and change that is not inclusive to all, specifically people of color.

Response PH174-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response PH174-2.

Comment PH174-2 The Dodgers Corporation and the City of Los Angeles have a long partnership together working to destroy and exploit communities of color. The gondola represents gentrification, the destruction of not only our communities, but environment and our beloved wildlife.

The gondola project is no different than the deal that was made to take away our families' generational wealth by destroying out three communities to build Dodger Stadium. The Dodgers and the Los Angeles City Council set to build the gondola in the middle of our communities, and this would only benefit the Los Angeles Dodgers. Our residents and small business owners will suffer. And with the so-called Revitalization Project, this is code word in our communities of color as gentrification, a long term that leaves our most vulnerable community members displaced with no benefits.

The history between the Los Angeles Dodgers and the Los Angeles City Council has left our city in worst conditions from the deal in the 1950s, when our homes in our three communities were destroyed, and the lies that were told to the public of building public housing today leave us with the current issues of our houseless, our unhoused and affordability crisis that affects us all today.

It is a win-win for the Dodgers and has been since Black Friday, May 8th, 1959, when our three communities were bulldozed and our families dragged out.

It is time to put a stop to Dodgers Corporation on exploiting the people of Los Angeles. I am strongly urging that everyone in the public and all elected officials oppose this project, as it will have damaging effects for generations to generations.

(Pause.)

It is time to put a stop to the Dodgers Corporation of exploiting the people of Los Angeles. I strongly urge that everyone in the public and elected officials oppose this project, as it will have damaging effects that will last for generations to generations.

Response PH174-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH175 – Xiangtian Xu

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH175

Comment PH175-1 My name is Xiangtian Xu. I have been a resident in the Chinatown area for more than 28 years.

I came here today to -- I want to say that I am very happy and I welcome and express support to the project, the LA ART Project by Metro.

Chinatown has had a lot of problems in the past, and I think this project is going to bring a great solution to those problems because it's going to alleviate the traffic issues. It's going to bring great businesses to this area. It's going to bring extra tourists. It's going to revitalize the Chinatown area, and it's also going to make the air quality much, much better.

In the past, we don't have a supermarket; we don't have a hospital; we don't have a library. People don't come to our area because the traffic is too bad.

But the LA ART Project is going to change all of that. It's going to make our community more prosperous and it's going to bring a lot of benefits for its residents. It's going to make our area more lively, and this project brings great effect on the aesthetics. I really like it.

In the apartment community that I live in, there are more than 500 residents just like me. Because of the weather, because they're old age, they are not able to come here today, but they have told me to must tell you that they also express support and welcome to this project. And they also wish for this project to finish rapidly, so we can start enjoying the benefits that it brings to us.

I want to express my sincere thanks and gratitude to the project and the company behind it.

Response PH175-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH176 – Chris Gibson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH176

Comment PH176-1 MR. GIBSON: Hello. My name is Chris Gibson, G-I-B-S-O-N, and I'm here to say that we do not want the gondola, for a variety of reasons, one being that there's no guarantee that the city won't be paying for this and the benefits of it will be privatized.

Response PH176-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment PH176-2 Another issue is that the UCLA Mobility Lab has shown that it won't reduce traffic,

Response PH176-2 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. Specifically, refer to Response ML-1 in Topical Response O, Response to UCLA Mobility Lab Study for discussion of the proposed Project's transportation analysis.

Comment PH176-3 and it certainly won't help with emissions because it's not an actual public transit. It's a novelty.

Response PH176-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular,

scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment PH176-4 And then, the third is that it will be a disaster for the people who live in this area and who are already being burdened by increasing rents, and will only be further pushed out by the gentrification as a result of the gondola.

And that's it. Thank you.

Response PH176-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Public Hearing Comment PH177 – Gabriel Owens-Flores

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH177

Comment PH177-1 MR. OWENS-FLORES: Hey, my name is Gabriel Owens-Flores. That's Gabriel Owens, O-W-E-N-S, dash, F-L-O-R-E-S. As a member of this community, I've lived here all my life. We're vehemently opposed to this. Every single one of my neighbors that I talk to on my street is opposed to this.

Response PH177-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH177-2 There has truly been no period of public comment where we felt that we've been listened to. Every single part of this process has felt very -- has not felt transparent at all.

COURT REPORTER: Give me one second.

(Pause.)

Whenever you're ready.

MR. OWENS-FLORES: Okay, cool.

It has not felt transparent in the slightest.

Response PH177-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four

held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH177-3 What we need, instead of a very expensive gondola, is more sidewalks. We need buses. We need all of these other resources that we've been systematically denied all this time.

I remember, like from my house, I have to walk about 30 minutes to get to a bus. There's no reason the buses can't go through every single one of the major arteries in and out of Dodger Stadium, and a single gondola is both something static that cannot be reused in other days and it is also way more expensive. Buses can be recommissioned and can be put on any different route on any different day; whereas, with the gondola, 283 days of the year, it supposedly will have no service.

Response PH177-3 In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment PH177-4 The other thing is I'm afraid of the gentrification that will occur. Like I said, 283 days of the year, this won't be used for game-day transit, which means it will just not be used at all. Instead, I suggest that it will be used, and what it will be used for is for building up of, basically, like a mall at Dodger Stadium and the continued gentrification of Chinatown, where people come, drive in, park at Dodger Stadium, and then, shop around there, and then, go to Chinatown to get food, or whatever, or go to any of the new, like any of the new buildings, then all of the commercial properties there and do retail there as well.

Response PH177-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not

exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Also refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH177-5 So, I'm entirely against this. I think that it is a very, very wild and disrespectful use of public funding.

Response PH177-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH177-6 And I just want buses. I just want more buses. Just like have a bus at every single artery in and out, on Scott, on Academy, every single one. Just have them run through and just like create a network of buses instead.

Thank you.

Response PH177-6 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Public Hearing Comment PH178 – Xulan Chen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH178

Comment PH178-1 MS. CHEN (Speaking through a translator): She wants to stop the gondola in Chinatown. We waste a lot of tax money. I hope the tax money can be spent on the hospitals and the low-income housing. We want the tax money to spend on senior housing and housing for the homeless.

So, we want the tax money spent on building a hospital, 24-hour urgent care, a hospital, so the seniors, then, have a place to go to when they need it.

Also, we would like our tax money spent on building more -- a grocery store, shopping more, public restrooms. Also, the bridge across the street to help the people with disability.

Thank you so much.

Response PH178-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Public Hearing Comment PH179 – Edwin Li

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH179

Comment PH179-1 MR. LI: All right. My name is Edwin Li. I am a Chinatown resident. My name is spelled E-D-W-I-N L-I.

And I am against the gondola. I don't believe that it will benefit Chinatown or its residents. Most of the business that the gondola people claim will benefit Chinatown, those people will fly over Chinatown. The gondola will not help.

Response PH179-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH179-2 I also believe it's such an invasion of privacy.

(Pause.)

Response PH179-2 Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and, as discussed in Topical Response M, Comparable Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project

would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH179-3 I am definitely against this gondola, and I believe this whole meeting is a farce. Everything here is promoting the gondola with these big-time billboards. I don't think the people with the gondola have the community's best interests.

Response PH179-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach during the Draft EIR public review period. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's

features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment PH179-4 Most of the people who are pro-gondola don't live in the neighborhood, and I think it will displace a lot of elderly.

Response PH179-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment PH179-5 Before, I never knew what a gondola was. It never even came into my vernacular. I think a more reasonable and practical form of transportation, if that is their goal, which I do not believe so, is to use the Dodger Express which we already have. It will be a lot less money and it would actually transport people in and out of Dodger Stadium.

Thanks. Yes, that's it.

Response PH179-5 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. The Draft EIR concluded that, even with a substantially increased Dodger Stadium Express bus capacity, the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between LAUS and the maintenance facility, would render the Alternative substantially less competitive with driving time than the proposed Project, thus reducing its ridership potential compared to the proposed Project.

Public Hearing Comment PH180 – Chris Hannan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH180

Comment PH180-1 MR. HANNAN: Hello. My name is Chris Hannan, C-H-R-I-S, separate word Hannan, H-A-N-N-A-N.

Again, my name is Chris Hannan. I represent the Los Angeles/Orange Counties Building and Construction Trades Council. We represent 48 affiliates with over 140,000 members. We're located at 1626 Beverly Boulevard, Los Angeles 90026.

Our members are going to build the project which is going to take cars off the streets. It's going to reduce traffic. It's going to reduce pollution. We're going to do it all union with local hire, giving an entry point into our apprenticeship programs and our local unions for local community.

We 100 percent support the project and believe it will be good for the City of Los Angeles. It will be good for workers and it would be good for the environment.

Thank you.

Response PH180-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Public Hearing Comment PH181 – Howard Amster

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH181

Comment PH181-1 Okay, My name is Howard Amster, A-M, as in Mary; S, as in Sam; T, as in Tom; E-R. I live in the San Fernando Valley.

I am very much for the gondola.

Response PH181-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH181-2 However, I posted the LA Daily News article from a couple of days ago. I posted that on Facebook and I got back a bunch of replies, one of which said, from a fellow named David Swartz, "I don't know, Howard. I used to ride the red line to work every day and I stopped because it got so unpleasant." I have since spoken with him. He is referring to the homeless problem.

I would be riding the red line to get to the gondola at Union Station. I often ride the gondola to the Ahmanson and the Dorothy Chandler. And I'm embarrassed to take a date there because it is so unpleasant because of the homeless problem.

My concern is affecting ridership on the gondola and just I have to drive down there now to the Ahmanson, but I would prefer to take the red line to get there, and to the gondola, when it's running. But something needs to be done to make this redline – and I am also told the blue line is an even bigger problem – to make it a more pleasant ride.

Another friend of mine said, "I'm not going to bring my 8-year-old son on a homeless train like this. This is like a billion-dollar mobile homeless shelter, is what the subway has become."

Those are my concerns. Thank you very much.

Response PH181-2 The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Public Hearing Comment PH182 – Kevin James

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH182

Comment PH182-1 REPORTER: Hi, your name?

MR. JAMES: My name is Kevin James, K-E-V-I-N J-A-M-E-S. Okay, I'm here representing almost 19,000 members of the International Union of Operating Engineers, Local Number 12, the majority of which reside here in Southern California.

Our members are the people who survey, inspect, build, and repair roads, bridges, and other critical infrastructure such as water systems, sewers, and storm drain systems, along with high-rise buildings and rail systems.

I'm here today to communicate the International Union of Operating Engineers' unconditional support for the proposed project labor agreement.

Please consider the benefits of project labor agreements such as providing contractors with a reliable and uninterrupted supply of qualified workers, ensuring the project will be completed on time and on budget due to the consistent supply of skilled and trained labor and creating an avenue to implement provisions to require contractors to participate in the improvement of local residents, and providing access to Union employment apprenticeship and training programs for women, minorities, veterans, and other under-represented groups.

I encourage you to join our membership in support of this important project labor agreement. Thank you for your time and consideration.

Response PH182-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Public Hearing Comment PH183 – Chris Wilson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH183

Comment PH183-1 MR. WILSON: Good evening, and thank you. My name is Chris Wilson, representing the Los Angeles County Business Federation, known as BizFed. We are a grass roots alliance of 213 diverse business groups mobilizing 410 employers with five million employees in LA County.

We continue to be in support of the proposed aerial gondola for several reasons. For one, this project will have the capacity to move approximately 5,000 people per hour out of the cars and into a zero admissions transit, thus reducing traffic congestion, pollutants, and greenhouse gas emissions that contribute to climate change. In other words, you will be able to get to a Dodger game without having to get into a car.

And secondly, the LA aerial rapid transit will operate daily to connect communities of El Pueblo, Chinatown, Mission Junction, Solana Canyon, and William Mead Homes to Union Station while creating a pedestrian link between the Chinatown goal line and LA's State Historic Park.

This is a win/win for LA, its local economy, and Angelenos everywhere, to get there by air. Thank you so much.

Response PH183-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Public Hearing Comment PH184 – Andrew Vought

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH184

Comment PH184-1 MR. VOUGHT: My name is Andrew Vought, V-O-U-G-H-T. I'm a resident of Los Angeles. I'd like to state my opposition to the proposed gondola which goes over Los Angeles State Historic Park.

Response PH184-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH184-2 The project would defile an historic state park for the private profit of a real estate developer, and none of the economics add up.

This costly solution will be an environmental disaster,

Response PH184-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to

supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH184-3 lots of un-needed investment in concrete while, according to UCLA research, it would be many times worse for the environment than that current free, commissions-free shuttle solution for electric vehicles.

Response PH184-3 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. In addition, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. The commenter asserts that there would be greater environmental impacts from the proposed Project compared to the Dodger Stadium Express without delineating specific environmental impacts of concern. The proposed Project offers a variety of environmental benefits. As shown in Table 3.3-5, Maximum Mass Daily Emissions Due to Operation of the Project, and Table 3.8-1, Summary of Project GHG Emissions, of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant and greenhouse gas emissions, respectively, in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles travelled and thereby decreasing emissions compared to existing conditions. Furthermore, the reductions in VMT would result in less traffic and congestion around Dodger Stadium, which the TSM Alternative would not alleviate due to the increased presence of buses on the streets in and around Dodger stadium. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH184-4 The project will gentrify our community, but the whole point here will vastly enrich the real estate developers.

Response PH184-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH184-5 The idea of gifting the gondola to a non-profit merely means that the developer will wash his hands of any responsibility for operation and maintenance. That will be paid for either by your tax dollars or by philanthropy which, instead, should be going to support our community and our open space.

Response PH184-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements.

Comment PH184-6 People say LA should get on the program because countries like Bolivia, Chile, and Germany use gondolas. I say we don't need to imitate these other countries. We need to do what is right for Los Angeles. Shame on Metro for promoting this sham project which will destroy our community. Thank you.

Response PH184-6 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such

systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH185 – Eleanor Bray

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH185

Comment PH185-1 MS. BRAY: My name is Eleanor. It's spelled E-L-E-A-N-O-R, last name, Bray, B as in boy, R-A-Y. So Los Angeles has been my home for the past seven years. I am deeply concerned about the Los Angeles aerial rapid transit project.

I'm currently pursuing my Master's in Social Work at Cal State LA, and social work is a profession where the foundation of it is to solve problems, but solving problems with the understanding that those closest to the problem are closest to the solution.

So what problems does the gondola solve, and who determined that billionaire Frank McCourt is the right person to be providing a solution to these problems.

Response PH185-1 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH185-2 Problem number one is the claim that the gondola will have a traffic. However, based on the research done by the UCLA Mobility Lab, it only reduces traffic around the stadium by one percent on game nights, but it does significantly increase traffic in other areas.

Response PH185-2 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose.

Comment PH185-3 Problem number two is the claim that the gondola will help reduce greenhouse emissions. However, the likelihood that people will simply just drive to the gondola station instead of driving to the stadium means that emissions won't be reduced at all. The traffic will just be displaced.

Response PH185-3 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N,

Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. As shown in Table 3.8-1, Summary of Project GHG Emissions, the proposed Project would result in a net reduction in greenhouse gas emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles travelled (VMT) and thereby decreasing emissions compared to existing conditions. As a fixed guideway transit project, providing new high-frequency high speed transit connections between the regional transit hub of LAUS and Dodger Stadium, the proposed Project is forecast to reduce VMT, as game and event attendees shift their travel mode from driving to Dodger Stadium to utilizing transit on the proposed Project. The Draft EIR provides details on how the existing, 2026 (Build Out), and 2041 (Horizon Year) VMT estimates were calculated in Section 3.17, Transportation, which is supported by analyses in Appendix N, Transportation Appendices. The comment provides no basis for their statement on anticipated traffic conditions from implementation of the proposed Project. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH185-4 Problem number three is the claim that the gondola provides much needed public transportation to Dodger Stadium, but we already literally have a shuttle bus that runs from Union Station on game night. And it's free, and people like using it.

Response PH185-4 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a

permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH185-5 So why are we asking those in the communities this will affect what their actual problems are and going to them for actual solutions. What about problems like investing in real public transit in needed areas of LA, affordable housing, community services, services for unhoused. No one asked for this gondola, and we shouldn't allow billionaires to use low income areas of Los Angeles as their play place. Thank you.

Response PH185-5 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, and public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH186 – Kenneth Chan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH186

Comment PH186-1 MR. CHAN: My name is Kenneth Chan, K-3 E-N-N-E-T-H, last name, C-H-A-N. I'm a resident of the neighborhood. I am against this project. I think that the process has been undemocratic. I think that the fact that we've had these fake pubic hearings where they shuttered everyone out in the back to make public comment without actually being public comment, that's no definition of public.

Response PH186-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in this Final EIR.

Comment PH186-2 And I'm also against this project because it's a bad use of public lands and it's a bad use of public funds. There's no transparency around the financing and what any of that looks like.

Response PH186-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for

the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH186-3 It's so obvious that McCourt funneled this project through a non-profit to get this through and has plans to develop the outlying area. This neighborhood needs more grocery stores, needs more affordable housing, needs an actual laundromat. And we are barely, you know, we're fighting for crumbs.

And yet whenever people come into this neighborhood, developers, et cetera, people like LAR, they just see it as a playground where they can throw up the gondola under the guise of public transportation, which we know is BS.

Response PH186-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an

Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. Further, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment PH186-4 They haven't given us any indication on what the pricing will be.

Response PH186-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH186-5 They haven't given us any indication on, like, how efficient it will be as use of public transit. There's the UCLA study out that actually shows that it won't improve traffic.

Response PH186-5 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.03, Air Quality, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR and does not appear to have been prepared for that purpose.

Comment PH186-6 This is just another luxury type development that they're trying to push into this neighborhood just like every luxury apartment that they build in this neighborhood that they say will be good for us. Yeah, and I'll yield the rest of my time.

Response PH186-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and

open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH187 – Richard Zaldivar

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH187

Comment PH187-1 MR. ZALDIVAR: Yeah, it's Richard Zaldivar, R-I-C-H-A-R-D , Zaldivar, Z-A-L-D-I-V-3 A-R. I am a community leader and I own, run a non-profit here in Los Angeles in downtown. I oppose this project. One, it is not environmental friendly.

Response PH187-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH187-2 It will create a lot more noise in the community. Our civic leaders fought many years to develop a state park, not to have something that's not natural to fly over their heads.

Response PH187-2 Refer to Section 3.13, Noise and Vibration, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how operational noise impacts from the proposed Project would be less than significant. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment PH187-3 It's not going to alleviate traffic going to cause called more traffic and new access points.

Response PH187-3 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH187-4 And finally, I don't think that it makes sense, when the Dodgers have such a big problem with alcohol abuse, and fights, and stabbings, to entice Dodger fans to ride over a park.

Response PH187-4 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features and how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities.

Comment PH187-5 And lastly, in any kind of business, when you apply for a license, when you apply for funding, or any kind of permit, you are also looked upon in your past history. The current owners or the leaders of this, the McCourts, have had a poor record of bankrupting the Dodgers and bringing in embarrassment to the City of Los Angeles. I don't think we want to do this again with a gondola project.

Response PH187-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or

raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Public Hearing Comment PH188 –Lee Suan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH188

Comment PH188-1 MR. LEE: My name is Lee Suan, L-E-E S-U-A-N. I live in Chinatown. My zip code is 90012. I am living here almost, like, in Chinatown, on this area, around this area 30 years. I grew up here, almost a traffic jam every night when the games started. And after the game, it would get worse until people complained.

People from outside parking on, I mean, like, housing area, you know, public area, and not convenient for tenants to come back to park their car. So I agree that they want to build, they call it a train, so what, like ---

REPORTER: The gondola.

MR. LEE: The gondola, yes. I agree they build the gondola. It's the best thing that -- even other countries are doing that. And why can't our area do it?

And people need for Chinatown, people moving around easy, you know, that area. And then from that side, I mean, from, I mean, area town that even every, what do you call, Medicenter, Civic Center, and here they have, I mean, how do you say. And even they have a traffic jam and then for three hours for people to get in the parking lot.

And we come back to that, on that side of any concert, you know, for an area that they are not, I mean, inconvenient for us to pass through any traffic lights, and even a lot of people moving around the area looking for parking.

My comment is I agree with them to build, I mean, the location is okay. It's not big deal, and we'll get dollars for it too.

And convenient for people from outside who are taking the line, red line, blue lines, any line from Union Station so that is easy for them to go to Dodger Stadium. And even at night, you know, there's more traffic. I mean, for this, I mean, what do you call, is a thing –

REPORTER: The gondola.

MR. LEE: Okay. And then at least no, I mean, after the season is over people can go and see Chinatown and go downtown. That area people, I mean, the people from other counties can visit, get down from Union Station.

REPORTER: Is that your comment?

MR. LEE: Yes.

Response PH188-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH189 – Anne Freiermuth

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH189

Comment PH189-1 MS. FREIERMUTH: Thanks. My name is Anne Freiermuth, F as in Frank, R-E-I-E-R-M, as in Mary, U-T-H. I live in West Los Angeles, and I am opposed to the gondola project.

I really troubled at the idea that the city would spend billions if dollars for a tourist trap that has nothing to do with public transit. I would love to spend billions of dollars improving our public transit system.

Response PH189-1 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Additionally, refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment PH189-2 And I don't think the gondola, which covers a very small amount of land, is going to get people out of their cars, it's not going to improve any part of going to Dodger Stadium.

It just seems so insanely, just such a insanely bad way to spend money and does not, I think, accomplish any of the goals that as they're stated.

Response PH189-2 The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed

Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH189-3 This proposal was put forth earlier. The community defeated it. It has now been moved to Metro, given brand new branding, but the base problem is still there. This doesn't help transportation, it's very much opposed by the people who live nearby. It's a poor use of resources and makes no sense.

Response PH189-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Public Hearing Comment PH190 – William Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH190

Comment PH190-1 MR. WONG: I oppose the gondola being built here in Chinatown.

(Simultaneous Speaking.)

MR. WONG: The reason being the gondola is very detrimental to the interests of Chinatown. The airspace above Chinatown should not have any gondola going through it.

The developer had the freedom and liberty to develop the gondola all the way over by the hilltop but definitely not in the airspace above Chinatown, because it has no advantage or benefits to Chinatown.

Response PH190-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project Features

Comment PH190-2 I am just wondering what's the reason behind centering the project here in Chinatown. What was the reason behind all this? I suppose its motivation is to stop Chinatown from ever developing again.

Currently, Chinatown is not doing well economically. The gondola is not going to bring any kind of benefit to Chinatown. Instead it will be all detriment.

Chinatown is ours, for the Chinese community, the general Asian population. It's the home to this group of people. I don't know how long -- it's about 200 years of U.S. history with Chinatown here.

Response PH190-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment PH190-3 There are more and more illegal structures, which goes against the planning for the land, a lot of buildings whose purpose are against the interest of the park, the skyscrapers or tall buildings where low income foreigners will never be able to afford, those with limited resources, or the low income earners find some way to improve our living conditions.

You know what I'm saying? Do you agree with me? I'm just talking practically.

Response PH190-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH190-4 Again whatever defines the facility they're setting up, who will be there? How many people 3 are visiting that stadium?

I've been here about 30 years. I never visited there even one time, no money, no talk. They're not going to be happy. That's why. I'm 75 years of age. So we fight for our interest. Thank you.

Response PH190-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Public Hearing Comment PH191 – Judy Chow

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH191

Comment PH191-1 MS. CHOW: First of all, I really oppose the construction if the gondola. Chinatown should have more hospitals, more markets, so that we get more prosperous.

Response PH191-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment PH191-2 Immediately stop the construction of the gondola. Whatever they're doing is not respecting the citizens and residents of Chinatown. If they want better public transportation, do some subway building, whatever, but never a gondola, never.

Response PH191-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment PH191-3 Also implication in terms of air quality will obviously get even worse. Construction should immediately cease and never again. I recommend build some more bus stations, more metro subway stations, probably that.

That's all, thank you.

Response PH191-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Public Hearing Comment PH192 – Elva Yanez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH192

Comment PH192-1 MS. YANEZ: My name is Elva Yanez. I'm a resident of El Sereno. I'm also active in environmental and environmental justice issues.

(Simultaneous Speaking.)

MS. YANEZ: And I am here today to basically say that I'm a former California State Park and Recreation Commissioner. I served from 2011 to 2019 during the time when LA State Historic Park was finishing up the interim use and moving into construction.

That entire time there was never a mention of a gondola. There was never a mention of the gondola during the environmental impacts report process. There was never a mention of gondola to public members who attended 65 public meetings about what they wanted to see in the start park when it was constructed.

Response PH192-1 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park.

Comment PH192-2 And very simply, this is a violation of CEQA. The idea that the EIR indicates no major impacts on the park and it's users is ludicrous.

So I fully expect a law suit. And really, at the end of the day, I believe that is where this issue will be resolved and justice for the communities who fought so hard to stop the warehouses on this land and to put a state park to provide rest, respite, for the people who have no park, who had no park before this park built in this region. So thank you.

REPORTER: Thank you.

Response PH192-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the

height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Public Hearing Comment PH193 – Jennifer Rodriguez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH193

Comment PH193-1 MS. RODRIGUEZ: My name is Jennifer Rodriguez, J-E-N-N-I-F-E-R, Rodriguez, R-O-D-R-I-G-U-I-E-Z.

REPORTER: Thank you.

MS. RODRIGUEZ: And my public comment is to not build this project, the gondola project, on our land. Because it is not something that the community wants or needs at this time.

We need more public infrastructure of not in this manner. We also need more park space, more open space. And this project would take that away.

Response PH193-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station(LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park.

Comment PH193-2 And we also need the Metro to listen to the community that clearly does not want this project as well.

Response PH193-2 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program and Business Interruption Assistance Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH193-3 And this will not help with traffic, or congestion, or whatever the project is claiming to help with. I know this because I live in Cypress Park, so I'm a nearby resident and I ride my bike though here all the time.

And Dodger Scandium just makes the traffic awful when they have games. And I am pretty certain that adding an, like, an attraction is only going to increase that traffic, not decrease it as is proposed or thought to happen.

Response PH193-3 Refer to Section 3.03, Air Quality, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions,

and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first / last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Public Hearing Comment PH194 – Miriam Bar-Zemer

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH194

Comment PH194-1 MS. BAR-ZEMER: So I have been opposed to the gondola project since I first learned about it, that it hadn't gone through a proper bidding process.

Response PH194-1 This comment indicating opposition the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Nevertheless, this comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment PH194-2 And there didn't seem to be an honest review of various transportation modes that could potentially serve the Dodger Stadium if that was the initial intention. LA transportation is notoriously horrible.

Response PH194-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. In compliance with CEQA Guidelines Section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. The Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the project objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. In response to public comments, this alternative was considered but dismissed from

further detailed analysis in the Final EIR because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH194-3 And I don't think the proposal really reveals the continuity of the cost that will be basically revealed for this -- sorry, I'm not expressing myself.

REPORTER. No, that's okay. If it gets a little loud, we'll give you some extra.

Response PH194-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH194-4 MS. BAR-ZEMER: Okay. And I started the draft environmental report. I have lived in downtown for basically 30 years at this point. I was raised here. And I am really saddened to know that the path -- I'm not anti-gondola in principle, but the path that it's taken is directly over our beloved state park which will, honestly, just ruin the view shed.

Response PH194-4 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, Los Angeles Union Station (LAUS), El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment PH194-5 And all the concerns that this community is raising in terms of gentrification I find very valid. It's been a long battle for Chinatown to maintain its status here. And reportability is obviously one of the biggest concerns. And this is just not a asset to the people who live here.

Response PH194-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding

neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH194-6 It really feels like a vanity project. Yeah, it's really more about the transparency of the process that feels really lost. So thank you.

Response PH194-6 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Public Hearing Comment PH195 – Ron Frank

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH195

Comment PH195-1 MR. FRANK: Okay, I'm Ron Frank, R-O-N F-R-A-N-K.

REPORTER: And please proceed, Ron.

MR. FRANK: I do live in this neighborhood, but if I didn't I would still be against this project. It's very much obviously a scam, and this should not be happening just to enrich one person.

Ostensibly, this is about saving the environment. Actually, it's a moving goal post, a moving horizon. They have so many different reasons for saying they want this gondola project to go through, and none of them will solve any problem with our -- the gondola is not a solution to any environmental or neighborhood problems.

It's a solution for Frank McCourt's problem with what to do with his half of the Dodger Stadium parking lot. And nobody talks about all the environmental damage that will happen when he does end up developing his half of the parking lot. And that's down the line, and that's something that's not at all addressed in any way.

And I'm certain that whatever project he comes up with will create environmental damage in the building of it and in the people patronizing it afterwards. It'll increase the attendance at Dodger Stadium when there's not a game.

Response PH195-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial

transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH195-2 As well, and this is just a personal thing, I have come to really love the wildlife in my neighborhood. And this would greatly affect that. I realize that's seen as a lesser thing in these matters, but the wildlife is important in the neighborhood. And it's great that it's here.

REPORTER: That concludes your comment?

MR. FRANK: I'm sure I have much more to say, if I was a little more organized, but that's it off the top of my head.

REPORTER: Okay, thank you.

Response PH195-2 The Draft EIR addressed Biological Resources in Section 3.04, Biological Resources, with supporting data provided in Appendix E, Los Angeles Aerial Rapid Transit Biological Resources Assessment, of the Draft EIR, and Appendix G Supplemental Biological Resources Report, of this Final EIR. The Draft EIR found that the proposed Project would result in less than significant impacts to biological resources.

Comment PH195-3 MR. FRANK: My name is Ron Frank, R-O-N F-R-A-N-K. And another concerning thing about this whole process is that it's very much that they don't -- there's no transparency in so many aspects of this, from even this here today. Who are all these people manning these booths? I imagine they're employees.

And it seems like a lot of people here are against the gondola, and a lot of people here who are for it are employed to be for it.

As well, there are so many changing names of who's trying to make this happen. It started out with Frank McCourt, then Climate Resolve, then Zero Emissions, then Metro, and who knows who else.

Response PH195-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit,

a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. The format of the in-person public meetings immediately preceding and during the Draft EIR public review period was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. During the two in-person public meetings that were public hearings, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who had set up at a "comment station" in the venue. Written comment

forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH195-4 And another big secret has to do with -- involves the budget. If somehow this project does get jammed through, what provisions are there for this to be paid for when they go over schedule and over budget? And how are they going to prevent the tax payers from having to rescue this boondoggle?

REPORTER: Does that conclude your comment? Please continue.

MR. FRANK: It offers nothing but blight and ruin. And it must be stopped before it gets to a point where it's gone too far, and it's just going to be a big bus wreck. Okay, thank you.

Response PH195-4 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Public Hearing Comment PH196 – Xochitl Mazanilla

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH196

Comment PH196-1 MS. MANZANILLA: Yes, my name is Xochitl Manzanilla.

REPORTER: And could you spell that for me?

MS. MANZANILLA: I spell it, like, X-O-C-H-I-T-L.

REPORTER: Yes.

MS. MANZANILLA: And my last name is Manzanilla, M-A-N-Z, as in zebra, A-N-I-L-L-A.

REPORTER; Okay, and your comments, please?

MS. MANZANILLA: My comments is that I oppose the gondola project very strongly for many reasons. We do not need it, the first -- number one. We do not need it. We already have free transportation to Dodger Stadium.

Response PH196-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives

which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment PH196-2 And it will be a big mistake doing it on areas where only low income families live. These are communities, the people work hard to put the bread on the table. And this will be a big mistake for that reason, because they are poor people. And having to pay $40 to ride the gondola, I think it will be not fair.

Response PH196-2 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH196-3 And it will affect terribly all the programs that we have at LA State Historic Park, Los Angeles State Historic Park. Like, flying the kites is a program, the farmers market that we have in the park, CiBiC Bike, Art in the Park, Tai Chi class, Yoga class, baseball, and all concerts in the park, and more programs that I cannot mention.

Response PH196-3 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins

would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment PH196-4 The real estate will be affected very badly with this gondola. People fought very hard so this land will be the beautiful park that it is today. And it's our beautiful LA State Historic Park. We don't want nothing to mess or destroy, come and destroy our beautiful park that we enjoy so wonderfully. Thank you.

Response PH196-4 Refer to Response PH196-3 for discussion of how the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park.

Public Hearing Comment PH197 – Miho Murai

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH197

Comment PH197-1 MS. MURAI: Hi, my name is Miho Murai.

And I am a Chinatown resident. And I am here because I want to show my opposition to the gondola project. I do not believe there's enough transparency regarding the funding for the project from Metro and Frank McCourt.

The construction costs could go up to $300 million. And the question that I have is who will be paying for this? Will taxpayers' dollars be used to fund this project? And if so, how much of our public funds are estimated to be used? And when will we find out about this? Also, who will pay for the maintenance and daily operations of the gondola?

Response PH197-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH197-2 Another major issue is, as a resident of Chinatown, there is no need for a gondola, because the transportation from Union Station to Dodger Stadium already exists as a free shuttle system.

Response PH197-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same

level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment PH197-3 People that are going to use the gondola are tourists that are going to come in because they want to have the view. But the reality is the people that live in the community will be the ones affected by the transportation, by the traffic.

Response PH197-3 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH197-4 And we do not have -- and we don't even know how much the gondola is going to cost. Most likely, it's going to not even be affordable to the residents. Chinatown is one of the most lowest income and cities within the LA County.

Response PH197-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first / last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment PH197-5 And then finally, I want to – the gondola project will impact historic and culture resources such as the LA State Historic Park, the Union Station, and the Pueblo de Los Historic Monument. The towers that are going to be built are not suitable to the locations at where they're at.

Response PH197-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment PH197-6 And more importantly, a gondola, it's just going to look weird. I'm sorry.

Response PH197-6 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment PH197-7 And then finally, this project will lead to displacement and increase the cost of rent in the area. And that's already happening all the time, gentrification.

Where I live currently, there's an 21 apartment building right across from me. For a two-bedroom apartment, it's $5,000. And as a result of that, they raised our rent in December. And so projects like this are not for the community.

And what it's going to lead to is the gentrification of our community. And it's going to lead to tourists coming into our community that can enjoy the gondola. But then they can go home and leave.

Response PH197-7 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses in Chinatown.

Comment PH197-8 And then who is going to be impacted by the air, who's going to be impacted by the traffic? It's us, the community. So we ask you to first ask the community what we want.

Response PH197-8 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice. The proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A,

Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment PH197-9 What we want is we want more affordable housing. We want markets, we want public transportation, we need to address the unhoused. And these are the things that we need right now as we're fighting the COVID pandemic.

We do not need a gondola project that's going to ruin our community and not at all support our community. Thank you.

Response PH197-9 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Public Hearing Comment PH198 - Martha Woodhull

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH198

Comment PH198-1 MS. WOODHULL: Hello.

MS. SISCO: Hi. We can hear you.

MS. WOODHULL: Yes, good. Don't start the clock yet. I want to turn mine on real quick so I can parallel yours. And I can do that whenever you're ready, and I can begin.

Shall I start my clock?

MS. SISCO: Sure. Please go ahead.

MS. WOODHULL: Thank you very much. My name is Martha Woodhull. My professional name is Marta. I'm a resident of the Metro Chinatown Senior Lofts. Forgive the slurring sound in my speech. I have a Invisalign in, yes? At the age of 68, I'm getting Invisalign, finally.

The reason I'm commenting is due to health issues. I had COVID and long COVID. I was unable to attend any meetings, but I have followed all of the documents.

Response PH198-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH198-2 Early on, when you first proposed this project, there was a representative actually at our building at Metro Chinatown, and I asked her to walk into my apartment to observe the impact of the Alpine Tower. I don't know that anyone has ever actually come inside any of our homes to experience what it will be like as a resident of the Metro Chinatown.

We have one window. We are a loft, narrow loft type of building, and our only window faces the Alameda Quarter. I am literally directly opposite the Alpine Tower, and I'm at about 100, 125 feet in the air. So, I'm very glad to see, looking at the EID today -- EIR, I mean, that you are going to be above my head.

So, so I was quite concerned about that. You're going to be 175 feet. By the way, that drawing is very not to scale.

But I'm the daughter of a civil engineer. My father was a mayor. I understand the difficulty of a massive project of this nature, minimally, but it's very distressing to me that no one has experienced, to my knowledge, the boots on the ground reality of the people living in extreme proximity to these structures. I think the tower will be about 50, 75 feet in front of my face, and it will probably occupy half of my window.

That isn't worrying me. I was mostly worrying about gondolas passing in front of my window. I see by the plans that they won't.

So, my time is up. I wanted to just give you that inform --

Response PH198-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Because visual impacts under the L.A. CEQA Thresholds Guide are assessed based on changes to public views, description of resident viewer groups was provided only for informational purposes as private views from residential properties are not protected under the L.A. CEQA Thresholds Guide.

Refer to Section 2.05, Proposed Project Alignment and Components, of Section 2.0, Project Description, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties and includes the proposed Project's profile along the alignment. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Public Hearing Comment PH199 - Chris Hannan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH199

Comment PH199-1 MR. HANNAN: Hello?

MS. SISCO: Yes.

MR. HANNAN: Hi. This is Chris Hannan with the Los Angeles-Orange Counties Building and Construction Trades Council, 1626 Beverly Boulevard, Los Angeles, California, here to speak in support of the project on behalf of 48 affiliate local unions and district councils representing over 140,000 members.

This project is not only going to create good jobs, but it's going to have a tremendous benefit to the Los Angeles Community by getting thousands of cars off the road and encouraging public transportation.

This is the second largest city in the country, and we need to have more access to public transportation, the last mile when we complete the trip on public transportation, and the Gondola Project is a fantastic project. It's going to get people off the roads and onto public transportation. It's going to be safe, and it's going to minimize the impact to the local community.

We've been in Los Angeles for over 119 years and strongly support the project. The project will be constructed with local community and the highest skilled membership in the world to make sure it's done as safe as possible.

Thank you very much.

Response PH199-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Public Hearing Comment PH200 - Peter Kwan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH200

Comment PH200-1 MR. KWAN: Hi.

MS. SISCO: There we go.

MR. KWAN: Hi. Can you -- hi. Can you hear me?

MS. SISCO: Yes. Thank you.

MR. KWAN: All right, thank you.

This is Peter Kwan (phonetic). I am a born and raised Chinatown kid -- actually, born in Sacramento, but moved here when I was one. I am now 60. My family's been here for well over 59 years with our businesses in Chinatown, and I am calling in support of the project.

One of the things that we are lacking right now in Chinatown is commercial activity. We have no supermarkets. We have no stores, and I just took a walk around Chinatown today, and a lot of them were already closed by 3:00 p.m.

Chinatown is dying a slow death. You'll notice that commercial property owners are -- when they pass away, their heirs sell all their properties. Well, that's because there's no commercial activity. If the commercial activity was healthy, the buildings would be worth more than the land. Right now, it's the opposite. The land is worth more than the building, so they're all moving on. The old generations are dying, and the young generation won't come back.

I'm probably one of five businesses in Chinatown that has stayed, and we're making it work.

The other issue I'd like to address that people are concerned with is rising rents. Rents don't rise because of a gondola. The reason why rents rise because there's a lack of housing. And the reason some areas have more demand than others, people are moving in for the quality of schools, for the sick --

Response PH200-1 This comment is indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting

new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing.

Comment Letter PH201 - Gay Yuen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH201

Comment PH201-1 MS. YUEN: Hello. You can hear me now, right?

MS. SISCO: Yes.

MS. YUEN: Thank you. My name's Gay Yuen. I was raised in Chinatown, taught in Chinatown, and still very active with the community there. On top of that, I'm the chair of the Chinese-American Museum, which is located at El Pueblo Historical Monument across from Union Station.

So, I'm intimately connected with the gondola in terms of the present design and proposal, and I've spoken several times in favor of the gondola because to me, it's a win-win, both for the El Pueblo Monument and also for Chinatown in terms of visitors coming in, visiting our vendors, eating in our restaurants, and visiting our public places.

Response PH201-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH201-2 So, I won't go into that as much as saying that my direct comment on the EIR is that I'm hoping, when we get to the point of community benefits, that there will be a concerted effort to include participants from Chinatown and from El Pueblo so that we can talk specifically about what the residents, what the merchants, and what all the others who are directly impacted by the gondola will be able to tell you what we want and what our community needs.

I think that I agree with Peter Kwan, that Chinatown can only survive if we infuse it with visitors who will come to our places of business. And, therefore, I urge that we continue to look at how to build the gondola with respect to what the needs of our communities are.

Thank you very much.

Response PH201-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the

Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding community, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The proposed Project would also provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project could partner, for example, with the Chinese American Museum to help in addressing visitor, educational, and customer access to the Museum. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter PH202 - Kris Chan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH202

Comment PH202-1 MS. CHAN: Hi. I don't know why you need my full name, but fine. My name is Kris Chan. I am a member of the Chinatown community, and frankly, I am so frustrated that we continue to have these hearings without any public transparency.

Response PH202-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person,

comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment PH202-2 This is clearly a cosmetic project of Frank McCourt, and this will do nothing to benefit actually community members of Chinatown.

We -- you literally said it yourself. We need a market. We need a hospital, and yet, you think building a gondola will save Chinatown?

Chinatown is not dying because we lack visitors. We need real community needs. We need things to benefit the older generation of Chinatown. We need actual affordable housing, and we're trying to spend millions of taxpayer dollars on these fucking stupid fucks.

I am respectfully asking you all to think about what low income community needs. You all are just doing this garbage work that doesn't actually amount to anything.

Response PH202-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment PH202-3 How much of the construction will decrease the air quality? None of this makes any sense. How many years will it take to build the goddamn gondola?

We -- there's so many things going on right now. We're in a pandemic.

Response PH202-3 Refer to Section 3.03, Air Quality, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts related to air quality.

Comment PH202-4 Rents are increasing because of this lack of affordable housing, and yet, we're all here sitting here listening to this as if Chinatown needs to be revitalized.

No. Chinatown community -- you all are just ignoring members who actually live there. They have been surviving, and they don't need a gondola. They need real community access, health care, hospital, market.

I don't know how many times we have to stress this: we don't need a gondola, and we're demanding that you get out.

Response PH202-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage,

utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter PH203 - Eric Adams

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH203

Comment PH203-1 MR. ADAMS: Hello. Can you hear me?

MS. SISCO: Yes.

MR. ADAMS: Thank you.

This project is a master class in deception and defrauding of the people. Everyone getting paid to work on this boondoggle should feel a deep sense of shame.

Do you want to know more about this project? You're going to find dead ends and feel-good fantasies.

You want to know who's paying for it? Good luck. Because no one knows.

Response PH203-1 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH203-2 Want to know who's designing it? It's very vague, but we do know for sure it's not a gondola manufacturer. The reputable ones want nothing to do with this project.

Response PH203-2 There are two manufacturers of 3S gondola systems in the world, Doppelmayr USA and Leitner-Poma. Refer to Comment P43, Doppelmayr USA, and Comment P123, Leitner-Poma. Refer to Section 9.0, List of Preparers, of the Final EIR for information regarding RIOS, the design architect for the proposed Project.

Comment PH203-3 Want to know who's operating it? A non-profit climate change parasite group with zero experience operating an attraction or anything relating to the public. In fact, all they claim to do is partner with other orgs that are actually doing the work.

But, hey, public-private partnerships yield paychecks. Right?

Response PH203-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. ARTT LLC's donation of LA ARTT LLC and the proposed Project includes ARTT LLC's continued support of the proposed Project with financial support and expertise, including funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR includes analysis by a team of qualified experts, consultants, and engineers, including Fehr & Peers as to transportation; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; and Nabih Youssef Associates Structural Engineering as to structure engineering.

Comment PH203-4 Who's asking for this? That, we know concretely. Not the people of Los Angeles, not the residents of Chinatown and nearby communities, only the owners of the Chavez Ravine parking lots, so they can build the Dodgers Americana Grove Live. This is not public transit. It is an attraction.

Response PH203-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Response PH203-3 for discussion of the Project Sponsor. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment PH203-5 So, let's start the push on what we really need to do. Eminent domain, bringing the Chavez Ravine back to the people. Let's right a wrong decades in the making.

We will not go kicking and screaming this time, but we are keeping notes, and taking receipts and names. Shame on you all.

Response PH203-5 Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine.

Comment Letter PH204 - Jon Christensen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH204

Comment PH204-1 MR. CHRISTENSEN: Okay.

MS. SISCO: Yes.

MR. CHRISTENSEN: Great.

My name is Jon Christensen. I teach and do research on environmental policy with a focus on equity and environmental justice in the Institute of the Environment and Sustainability, the Luskin Center for Innovation, and the Luskin Center for History and Policy at UCLA.

I'm deeply concerned about the lack of environmental justice and equity in this proposed project, as well as in the Draft Environmental Impact Report itself.

Environmental justice is defined by four important concepts: recognition justice, participatory or procedural justice, capabilities or capacity justice, and distribution justice.

Response PH204-1 Refer to Topical Response N, Environmental Justice, for discussion of how The Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and the proposed Project is consistent with General Plan policies related to environmental justice, including by reinforcing or encouraging the establishment of a strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements, and by ensuring quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements. As discussed in Topical Response N, the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment PH204-2 This project fails on all four fronts and the DEIR itself fails on three of the four.

First, the DEIR and the project have failed to adequately recognize the neighbors of this project who will bear the greatest brunt of its impact.

Response PH204-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH204-3 Second, the DEIR process has been flawed from beginning to end. It has been designed and carried out as a dog and pony show promoting the project and gaslighting neighbors about its true impacts. Neighbors have not been given adequate opportunities to participate, to be heard and listened to.

No wonder they made their voices heard at your last meeting. That is a tried and true method of environmental justice when authorities refused to enable authentic participation in the process.

Response PH204-3 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project

alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following, the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. This fourth, continued public hearing was provided for the sole purpose of receiving verbal public testimony on the Draft EIR for the proposed Project. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment PH204-4 Third, Frank McCourt and the other proponents of this project have done nothing to support the capacity and capability of disadvantaged neighbors to participate in this DEIR process or the planning that preceded it.

Response PH204-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and

interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features.

Comment PH204-5 Fourth, this project is a classic case study of distribution injustice. The burden of the project would fall on disadvantaged neighbors, who would enjoy none of the supposed benefits of the project which, by the way, will not significantly reduce traffic and pollution around Dodger Stadium, and will be used by very, very few people locally to get around the neighborhood and visit El Pueblo, Chinatown, Los Angeles State Historic Park, and Elysian Park.

Response PH204-5 Refer to Response PH204-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger

Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game and the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan.

Comment PH204-6 I urge you to analyze and respond to these environmental justice concerns in this environmental impact review.

Response PH204-6 This comment provides a general conclusion to the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH204-1 though PH204-5.

Comment Letter PH205 - Maria Flores

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH205

Comment PH205-1 MS. SISCO: Yes.

MS. FLORES: Yes. Thank you.

Good evening. My name is Maria Flores. I am here in solidarity with the Chinatown Community for Equitable Development, an organization that builds grassroots community power that is based on the L.A. Chinatown area. They are all volunteer-run, and I am here because I am actually a resident of the South Central L.A. neighborhood.

Response PH205-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH205-2 And something that we have in common is that our neighborhoods are both working class and immigrant family based, primarily. And we understand the struggles that happen in our neighborhoods when gentrification happens.

And I would just like for it to be clear to Metro and anybody supporting this project that we know, people in our community, the families, the students, the workers, know that all the projects coming into our primarily working class neighborhoods should be housing focused.

So, nothing comes into a neighborhood that is not directly benefitting a community, especially one that is primarily made up of Chinese immigrant families that have nowhere else to go.

We also have nowhere else to go, so I'm just here to make -- to let people know that we will stand with you, and that projects like these will stop happening because we will become united.

Response PH205-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by

alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment PH205-3 And, you know, it's really unfortunate to see why Metro decides to prioritize a project that they know clearly will displace families. So, know that if it comes need to be, we will be there physically to prevent these kinds of projects happening in our neighborhoods.

We're tired. We have nowhere else to go, and we're going to take a stand. So, prepare to be disappointed.

Thank you.

Response PH205-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities.

Comment Letter PH206 - Pat Suzak

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH206

Comment PH206-1 MR. SUZAK: Hi. Good evening. Pat Suzak (phonetic) with CREED LA here.

First, I want to say that although there have been some people on the call that are opposed to the project, there are a lot of people that are excited about the project. And I think that you can look online and you can read a lot of the reviews, maybe a lot of the people that aren't on the call tonight, but most of what I'm seeing and understanding is there's a ton of people that are extremely excited about the project.

Response PH206-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH206-2 It does have a big environmental benefit for the people that are going to be riding the gondola, for the reduction of cars on the road, and the huge traffic benefit, and I think we'll see. We're going to see the difference, especially for Dodgers fans and congestion that sometimes takes place in the Dodger Stadium parking lots. So, you're going to see a noticeable benefit there.

There's a tourism benefit. We always want to make sure that we're continuing to promote Los Angeles as a city that's welcoming technological innovation and all of the things that benefit a city when it comes to how we present ourself. So, we want to continue to be right there on the bleeding edge of those kinds of innovations.

And continuing the benefit, the upgrade to Chinatown. There's some features and attractions that, obviously, once we get the gondola system going then there are going to be some other things that people are going to want to suggest, and there's going to be an additional attraction to that area.

Response PH206-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, the proposed Project would exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses in Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH206-3 There are people that are also seeing the vision of this project and thinking, you know, where else could it go? Crypto Arena, L.A. River Bike Path, Echo Park. So, people are becoming invested in this vision and deciding that they want to look at where that could expand to.

And so, all of that being said, CREED is absolutely in favor of this project. We think it's great, and we are in total support.

So, thank you for your time. Have a good evening. And God bless you.

Response PH206-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH207 - Sarah Harris

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH207

Comment PH207-1 MS. HARRIS: Yes. Hello. Thank you.

My name is Sarah Harris. I am calling on behalf of the Black Business Association in support of L.A. ART, the zero-emissions gondola for Union Station, from Union Station to Dodger Stadium.

Most importantly, the BBA supports the gondola and the 35 percent goal for local, and small, and diverse businesses.

So, we look forward to seeing that happen, and thank you very much.

Response PH207-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter PH208 - Mark McCrea

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH208

Comment PH208-1 MR. McCREA: Hello there. My name is Mark McCrea, and my comments are twofold.

One, as a private citizen, I am totally against this project. It is an eyesore and would be a disruption to so much of the community. Everything Frank McCourt does is as a profiteer. He only wants money. I think it would be a very unfortunate thing for anyone around.

Response PH208-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment PH208-2 I do fear that there is going to be more drunkenness of the Dodger attendees, and when they get in the gondola, I am sure there is going to be violence. Would you want to be one of the two San Francisco fans in the gondola full of Dodgers? No.

Response PH208-2 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators

would have the ability to contact local security, law enforcement or other emergency response agencies as needed.

Comment PH208-3 Secondly, I'm on the board of Friends of Elysian Park, which is an organization that has been protecting Elysian Park since 1965 from development.

We, as an organization, are completely opposed to this development. It is a destruction of viewscapes from Elysian Park, from the State Historic Park, from people in Chinatown, even Cathedral High School's athletic field. This will be disruptive to everything and visually horrible.

Response PH208-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment PH208-4 There are obviously abilities to have more electric shuttles going up to the stadium and transport many more people than the gondola would. If you've ever gone to Mammoth Mountain, can you imagine how long it takes to get 500 people on the gondola? The lines would be immense.

Response PH208-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range or Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon,

and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the proposed Project would carry up to approximately 5,000 passengers per hour per direction. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment PH208-5 And this is also the development, you know, the first foray into a commercialization of the parking lot areas. It would bring more people and destruction into the pristine area of Elysian Park. Elysian Park means paradise, and we don't want to violate that with a Frank McCourt project that is a totally useless, ugly eyesore, and not good for us.

Response PH208-5 Refer to Section 3.16, Parks and Recreational Facilities, for discussion of the proposed Project's impacts on parks and recreational facilities, including Elysian Park, which would be less than significant. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Response P208-3 for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the

surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH209 - Ted Green

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH209

Comment PH209-1 MR. GREEN: Thank you very much. I unmuted on my end. Can you hear me?

MS. SISCO: Yes, we can hear you.

MR. GREEN: Excellent. Thank you.

My name is Ted Green. I'm the legislative consultant for the Los Angeles LGBTQ Chamber of Commerce. The Los Angeles LGBTQ Chamber of Commerce strongly supports this project, and there are really three reasons why.

One, for what this project would mean for the utilization of Union Station and transportation coming into and out of Union Station. Union Station happens to be my favorite building in Los Angeles, and this would be terrific for its future.

Response PH209-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment PH209-2 Number two, what this project would mean for tourism. Tourism underpins the Southern California economy and it's really important. A gondola would attract tourists to our area.

I've ridden the gondola in Spokane, Washington. It's wonderful. All due respect to Spokane, there aren't a whole lot of reasons to visit there, but the gondola is one, and that would be the case in Los Angeles as well.

Response PH209-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project

alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH209-3 And probably number three, it's because of the project developer's significant commitment to spend 35 percent of its money with diverse businesses, minority-owned, veteran-owned, LGBTQ-owned businesses.

Response PH209-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment PH209-4 You know, how do you remedy historic and current discrimination, marginalization against certain communities? It's by projects like this spending good money with vendors from those communities. That funding lifts all boats and is worthy of our support.

MTA has said it's open to extraordinary innovation and private part --private-public partnerships. This project absolutely delivers that on a plate and is well deserving of our support and the MTA board's support.

Thank you very much.

Response PH209-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses.

Comment Letter PH210 - Omar Galindo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH210

Comment PH210-1 MR. GALINDO: Good evening. My name is Omar Galindo on behalf of UA Plumbers No. 78 and our 2,000 members. I'm proud to be here in support of this project.

This project will reduce greenhouse gas emissions by reducing traffic around Dodger Stadium, as well as making the city more attractive to residents and tourists alike.

Response PH210-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH210-2 The developer has agreed to use responsible contractors, local hire, and livable wages, and that's a development that, in Los Angeles, most of us like.

Our local is encouraged by this project and eager to see it begin construction.

Thank you

Response PH210-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Comment Letter PH211 - Gus Torres

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH211

Comment PH211-1 MR. TORRES: Good evening, everybody. Can you hear me?

MS. SISCO: Yes, we can.

MR. TORRES: Yeah. My name is Gus Torres (phonetic), and I represent UA Local 255 Pipefitters, Welders, and Apprentices.

We're glad for the opportunity to speak tonight to support this project.

Response PH211-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH211-2 Nearly 5,000 people per hour per direction will be shuttled through these gondola routes, and the time between Union Station and Dodger Station will become approximately 7 minutes. This means a huge impact on our local traffic in that area.

Response PH211-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH211-3 I also support and applaud the gondola project's commitment to work with the building trades. We need more examples of projects like this which involve the building trades and their skilled and dedicated local workforce of eager men and women.

Thank you very much for your time, and God bless

Response PH211-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Comment Letter PH212 - Marianna Gatto

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH212

Comment PH212-1 MS. GATTO: Yes. Good evening, everyone. My name is Marianna Gatto. I am the director of the Italian American Museum of Los Angeles, which is located across from Union Station overlooking Olvera Street. I am also a native Angelena whose family settled in Lincoln Heights back in 1947 when the neighborhood was one of the city's Little Italys.

I've been the Director of the Italian American Museum of Los Angeles since 2010, and have worked at El Pueblo since 2005.

We support this project and feel that this investment of private dollars will contribute to the vibrancy of the neighborhood and increase awareness of the city's birthplace, its history, and promote visitation to its various museums, businesses, and cultural sites, as well as their preservation.

Response PH212-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history.

Comment PH212-2 We also feel that this project will prove to enhance security in the neighborhood, which is sorely needed.

Thank you for your taking the time to listen.

Response PH212-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation.

Comment Letter PH213 - Erica Garcia

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH213

Comment PH213-1 MS. GARCIA: Hi. My name is Erica Garcia (phonetic), and I am very excited to support the gondola project.

I was recently in Mexico City, and I was fortunate enough to ride the gondola. And I hope it comes to Los Angeles. It's a fantastic experience that I had in Mexico, and I would like to have the same transportation system here in Los Angeles.

Response PH213-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH213-2 But I'm very upset at the protestors from the last meeting on January 12th. How dare they try to silence us and the supporters with their opinions? The protestors took the meeting and yelled profanities all night long, and Metro, you should be ashamed for allowing this to take place.

So, thank you for allowing me to share, and I hope the gondola project comes to life. It's a great project.

Thank you very much. Have a good night.

Response PH213-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the disruptions from certain attendees during the January 12, 2023, public hearing. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment Letter PH214 - Alex Alvarez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH214

Comment PH214-1 MR. ALVAREZ: Good afternoon. Can you hear me?

MS. SISCO: Yes.

MR. ALVAREZ: Okay. Good afternoon. My name is Alex Alvarez. I'm a lifetime Dodger fan, and we have to deal every single time with traffic around Dodger Stadium on game days, especially myself, that I have been going to Dodger games all my life. This gondola project could take 3,000 cars off the road, making it easier to get around, and reduce air pollution from cars.

In my case, and I believe most Dodger fans will agree, I support the gondola project because it will be great for Los Angeles, for the surrounding areas, for Dodger fans and, of course, for Dodger Stadium. And it will reduce the traffic, especially when we leave at game time at the end of the game.

So, please, consider this project. And I yield back, and thank you for the time.

Response PH214-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH215 - Roy Frank

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH215

Comment PH215-1 MR. FRANK: Hello.

MS. SISCO: Hello.

MR. FRANK: Hi. This is Ron Frank, and I'm calling because I'm very, very, very much opposed to the gondola.

Anyone who pays attention to how this is all proceeding can't help but notice how deceptive this all is. It's a scam to benefit just one person. And before this, what did Frank McCourt ever do to protect the environment? Here, he's only protecting his bank account, I believe.

As well, the lack of transparency and ever-shifting aspects of the project are incredibly concerning.

Response PH215-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. The Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description, disclosing that the proposed Project would operate daily for surrounding communities in addition to providing service to Dodger games and any special events at Dodger Stadium. The Draft EIR examined the potential environmental effects associated with implementation of the proposed Project on 20 environmental issue areas with detailed analysis based on Section 2.0, Project Description, of the Draft EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision

makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment PH215-2 It's bad whack-a-mole. This will not take cars off the road; it will just shift the traffic. It will not diminish pollution; in fact, the building of the gondola will only create more pollution, and there will be more pollution after Frank McCourt develops his half of the Dodger Stadium parking lot.

So, the things that they're putting forth are all lies, and it really is just bad whack-a-mole: the changing budget, the shifting developers under whose auspices this is proceeding under keeps changing, and even the reasons for building the gondola change all the time.

Response PH215-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Response P215-1 for discussion of how the Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description disclosing that the proposed Project would operate daily for surrounding communities in addition to providing service to Dodger games and any special events at Dodger Stadium. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between

the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment PH215-3 Unclear how much will it cost. Not $125 million anymore. Last they said was $300 million, and that was long ago, so I'm wondering what the cost is now. Must be getting close to half a billion dollars by now, I would think.

Response PH215-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH215-4 Let the taxpayers vote on whether or not this should go forward. That's why the public meetings are doing all they can possible to keep the public participants separate from each other at Union Station and at the high school. To have people give their comments to a stenographer behind the curtain makes you wonder, why hide us from each other?

It's clear the proponents have much to hide.

Stop the gondola, please.

Response PH215-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the

Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment Letter PH216 - Casa Wilson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH216

Comment PH216-1 MS. WILSON: Hello. Can you hear me?

MS. SISCO: Yes.

MS. WILSON: Okay. My name is Casa, C--A-S-A. My last name is Wilson. I live in the neighborhood.

I attended the last hearing at the high school. I had no problem leaving a public comment, despite the protests, and I talked to people who work on this project at length, and I'm even more against it now after that.

Let me run down the list:

Response PH216-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment PH216-2 Light pollution. This thing's going to run until midnight every single day. Dodgers fans ruin our lives half the year. Now they're going to ruin it every day of the year.

Response PH216-2 The Draft EIR addressed impacts from light and glare, in Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The Project area is urbanized and has a high level of existing ambient light. Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, and towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and mobility hubs would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction. As discussed in Section 3.01, Aesthetics, of the Draft EIR, at page 3.1-53, a Lighting Study

was conducted to determine the proposed Project's potential environmental impacts resulting from its lighting and illuminated signage program, evaluating impacts with respect to light trespass and glare. The Lighting Study concluded that operations of the proposed Project would result in a less than significant impact for light and glare.

Comment PH216-3 No parking. I guess we can't park on our streets anymore. One of the consultants told me that's not their problem.

Response PH216-3 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH216-4 No transparency. Who's behind this? How much will the taxpayer have to pay for this? How much will these tickets cost? They couldn't even tell me.

Response PH216-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH216-5 They're ripping up the park to put this hideous thing in, which is honestly just a tourist trap and gimmick. Part of the Angeles National Park is going to be ripped up where the farmer's market is, where people picnic, where they fly kites, to put in a private company's product to make money.

Response PH216-5 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project

alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment PH216-6 I find it curious not a single person has spoken up in favor of this project who isn't going to make money off of it -- or is a Dodgers fan, of course. But these aren't people who live here and have to live with this every single day.

Response PH216-6 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment PH216-7 Also, one of the consultants for the project told me, when I asked him what the point of it is since there aren't Dodgers fans every day, said that they're going to put a

transit hub up at Dodger Stadium and provide shuttles and electric scooters all over Elysian Park. And I haven't really heard much about that, so I wonder if it's even true.

Response PH216-7 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment PH216-8 This is not a project for people that live here. This is not a project for people in Los Angeles.

You know, I guess we're all in our own echo chambers. I don't know a single person in favor of this. I haven't heard a single peep about someone who wants this and doesn't think it's an absurd waste of money, except Dodgers fans commenting on it on Instagram.

Response PH216-8 Refer to Responses P216-6 and P216-7 for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station and for discussion of

the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment PH216-9 And it's really nothing that adding more electric buses couldn't also do. This is a waste of money, and I hope you'll stop this ridiculous project.

Response PH216-9 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter PH217 - Katherine Norian (Chinatown Station Owner)

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH217

Comment PH217-1 MS. NORIAN: Can you hear me?

MS. SISCO: Yes.

MS. NORIAN: My name is Katherine Norian. I represent Chinatown Station Owner, which opposes the project.

Response PH217-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH217-2 Our client's December 16th letter identified the Draft EIR's many fundamental defects, including a project description that shifts from section to section and omits information critical to the impact analyses, impact analyses that are incomplete and rely on speculation, and significant conclusions based on defective mitigation measures.

Response PH217-2 This comment provides a general overview of the comments raised in this letter and Comment P140. Responses to the comments contained in this letter are provided below in Responses PH217-3 through PH217-6, and Responses to P140-1 through P140-56. As discussed in PH217-3 through PH217-6, and Responses to P140-1 through P140-56, the Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description, disclosing that the proposed Project would operate daily for surrounding communities in addition to providing service to Dodger games and any special events at Dodger Stadium. The Draft EIR examined the potential environmental effects associated with implementation of the proposed Project on 20 environmental issue areas with detailed analysis based on Section 2.0, Project Description, of the Draft EIR. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP will prescribe for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment PH217-3 But most critically, the Draft EIR analyzes only part of the true project. That true project is a two-phased project, all of which must be analyzed in the Draft EIR.

This project, Phase 1, provides transit to Dodger Stadium to reduce vehicle travel and thus the need for the parking lot, and therefore clears the way for the Phase 2 project to redevelop the parking lot with the offices, shops, and entertainment uses planned for only the Dodgers' parking lot lease.

The Draft EIR evidences the need for this Phase 1 project to both enable and support the Phase 2 redevelopment. For example, several sections narrow the focus of their analyses on how the project would reduce Dodger Stadium vehicle traffic.

Response PH217-3 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. The Dodger Stadium property is approved only for Dodger Stadium and ancillary uses and structures as set forth in the Conditional Use Permit for the Dodger Stadium property, with restrictive designations and zoning not consistent with the uses speculated by commenters. The independent utility of the proposed aerial gondola project – the first permanent transit connection to one of the region's most visited venues – has been well established.

Comment PH217-4 The project relies primarily on tourism, not game day and neighborhood ridership, for its projected 18-hour a day operation. So, why assume so many tourists would be drawn to an empty stadium and an unimpressive view unless a shopping and entertainment venue is planned at the redevelopment parking?

Response PH217-4 Refer to Response PH217-3 for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how the proposed Project would be configured to operate based on the anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project has the flexibility to operate at varying speeds and capacity depending on ridership. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for a discussion of the proposed Project's ridership estimates considered how the proposed Project would serve the transit needs of a number of distinct market segments including: Dodger

Stadium game and event attendees, employees, tourists, neighborhood riders, and Los Angeles State Historic Park visitors and event attendees. The proposed Project would provide fixed route transit service to several neighborhoods including Chinatown, Mission Junction, Elysian Park and Solano Canyon, and to destinations around the Los Angeles State Historic Park. Ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis. Accordingly, the proposed Project may be configured to operate based on the anticipated ridership, inclusive of not only tourists or others who may want to ride the proposed Project, but visitors to the Los Angeles State Historic Park and Elysian Park, and commuters or residents in adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, Elysian Park, and Solano Canyon. As detailed in Appendix N, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles.

Comment PH217-5 The Draft EIR also discredits any need for the project other than to serve Dodger Stadium: that is, to serve the underserved neighborhoods. Chinatown and Mission Junction are already served by the Gold Line and don't need the disruption of another stadium – or another station.

Response PH217-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. There are several reasons why neighborhood transit users may ride the proposed Project. The proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit

systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH217-6 And the project can't serve neighborhoods near Dodger Stadium because it doesn't have a first mile/last mile hub at the Stadium to serve the projected ridership from these neighborhoods.

Metro must reside --

Response PH217-6 As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment Letter PH218 - Sunjana Supekar (The California Endowment (TCE))

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH218

Comment PH218-1 MS. SUPEKAR: Can you hear me?

MS. SISCO: Yes.

MS. SUPEKAR: Thank you. I'm Sunjana Supekar of Chatten-Brown, Carstens & Minteer, and on behalf of the California Endowment, we wish to express our strong opposition to this unsolicited, private tourist attraction representing itself as public transportation.

We oppose this project because the community did not ask for it and does not want it. They want real public transportation solutions.

Response PH218-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment PH218-2 The project will not reduce but actually displace traffic noise and pollution from Dodger Stadium to already impacted communities in and around Chinatown, disrupting businesses and services and accelerating gentrification.

Response PH218-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and

Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (LAUS) to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility

access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH218-3 This private project will require the use of public land, airspace, and likely public resources to be able to operate.

Response PH218-3 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH218-4 Finally, a superior, low emission public transportation option already exists by using electric buses to expand the already effective free Dodger Express Bus.

Response PH218-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Further, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger

Stadium Express. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game.

Comment PH218-5 The Draft EIR presents misleading and incomplete analysis to the detriment of the public who, instead of getting information, are given an infomercial.

We submitted two letters detailing the DEIR's deficiencies. Please carefully consider the points raised in those letters.

Response PH218-5 Refer to Responses GO17 and PH17 for responses to the letters referred to in this comment.

Comment PH218-6 We are also concerned because the proposed Alameda and Alpine towers are located in an earthquake liquefaction zone.

Response PH218-6 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A.

Comment PH218-7 We close by highlighting the numerous other public comment letters expressing concern about the project or opposition to it. These letters are from groups including Homeboy Industries; Gabrieleño/Tongva San Gabriel Band of Mission Indians; Playbold Park Association; Los Angeles Parks Alliance; California State Park Rangers Association; Natural Resources Defense Council; Sierra Club, Los Angeles Union Station Circle Society; SOCA Gondola, including but not limited to Phyllis Ling; L.A. River State Park Partners; Coalition for a Beautiful Los Angeles; State of California Natural Resources Agency, Department of Parks and Recreation, and the Department of Fish and Wildlife; City of L.A. City Administrative Officer; Los Angeles Conservancy; Land Protection Partners; S&R Partners, LLC, a revolving family company; Trust for Public Land; and Latino Outdoors.

There are better solutions for Metro and the City of L.A.'s actual public transportation needs. We ask that you please stop this gondola project now.

Response PH218-7 Refer to Responses GO15, S5, GO8, GO14, P511, P708, GO28, GO13, GO12, GO4, P700, P709, P710, PH24, GO21, GO18, S1, S2, L2, GO16, P701, GO27, and GO22 for responses to the letters referred to in this comment. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter PH219 - Jason Fujimoto

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH219

Comment PH219-1 MR. FUJIMOTO: Thank you. My name is Jason Fujimoto. I'm calling on behalf of the Los Angeles Chinatown Corporation. We are the founding organization of Chinatown when it was displaced.

Our family has been in Chinatown for well over 80 years. Most of our family and friends have owned businesses and currently still own businesses. A lot of our family members still live in Chinatown, and we support the gondola project general concept.

Response PH219-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH219-2 We definitely have concerns, as some of the others do, in terms of some of the environmental issues and impacts, but in general, we do support it.

Response PH219-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Comment PH219-3 So, we don't oppose it, and the reason we do is that we, as I think one speaker has mentioned, is that we need activity in Chinatown. Chinatown is dying, despite some of the other comments.

Speaking to the businesses, merchants, even family members, there is no tourism. There is no activity. There is no foot traffic in Chinatown, and with the concept of the gondola, it might help bring in people into the Chinatown community to help revitalize some of the businesses.

And so, some of those mom and pop businesses that we're trying to protect, hopefully, if we can bring in the tourism, we will help support and bring business to these mom and pop stores. And if we don't, then those mom and pop stores will close up, close down.

So, we, as a family, as an organization, we support, again, in concept. We don't oppose it, and we hope that all the different sides can come together to make it happen.

Response PH219-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment Letter PH220 - Phyllis Ling

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH220

Comment PH220-1 MS. LING: Hi. I have five seniors here.

MS. SISCO: Oh, hold on.

MS. LING: I have five seniors here who would like to speak, and I hope that they can each be given 2 minutes. It's hard for them to join the meeting. That's why I'm here helping them with my computer.

So, is that okay?

MS. SISCO: Do you have a comment, Phyllis? Or is it the five seniors that are there with you?

MS. LING: I have a comment, but I'm also on another device listening in English. And I'm on this device, and they're with me, but we're listening in Cantonese on here.

So, I would make the comment I'm sharing another device with my sister. So, I'm logged in on another and have my hand raised on another.

MS. SISCO: Okay. Yeah, thank you.

So, let's take one comment for now and let me think about the logistics of taking five people, because we've generally been going in the order that the hands are raised.

So, let's do one comment now, and then we'll think about how to take the five additional comments. So, is there one of the individuals that are with you, Phyllis, that's prepared to provide a comment?

(Foreign language spoken.)

MS. SISCO: Phyllis.

MS. LING: Uh-huh?

MS. SISCO: I want to give the interpreter a chance to relay the comments. I'm not sure if that was two speakers or one.

MS. LING: It was two speakers.

MS. SISCO: Okay, so the interpreters are providing consecutive interpretation, so I want to give them a chance to relay the comments that were made, and then we can go to the other three individuals that wanted to provide comment.

Response PH220-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public

review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

Comment PH220-2 MS. P. LING: This is actually Phyllis Ling.

MS. SISCO: Okay.

MS. P. LING: I'm sharing the phone with my sister. Can I go first?

MS. SISCO: Yes.

MS. P. LING: Okay, could you please restart my time? Okay, thank you. Yes, so this is Phyllis Ling. I'm a resident under the route of the gondola directly across from the massive Broadway junction.

Response PH220-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH220-3 First of all, the draft EIR is deficient and deceptive. It needs to be redone or, better yet, stop this project. If you must continue, I have these comments.

Response PH220-3 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment PH220-4 The smart glass for privacy sounds like a lot of lip service to us residents.

There's no explanation as to how it would be implemented. We need to know where it would be activated.

There are a lot of residents along the route, so if the windows are fogged up 50 percent of the time, that doesn't sound like a good experience for tourists who are supposedly funding this project, and there's maintenance.

If the smart glass is malfunctioning, will the cabin be taken out of service? How would the operator know? Would they just be relying on residents to report malfunctions?

We don't think the measures to protect our privacy should be treated lightly or like a courtesy. This is an essential part of the system.

Response PH220-4 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, routine cabin maintenance, including maintenance of the cabin privacy glass, would be performed by the system operator. Refer to Response P702-16 for additional discussion of the reasonable expectation of privacy on private property.

Comment PH220-5 The maps on the alignment profiles don't show enough detail. How are the additional buffers treated legally? How low is it? You want to go over my property, would I have to cut back my avocado tree for the gondola? Would I be required to allow McCourt's people access to cut back my tree whenever they want? These are little details, but they matter.

Response PH220-5 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Figure 2-7 in Section 2.0, Project Description, shows the proposed Project's ANSI Requirements and Additional Separation Buffer. Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2, Project Description and 3.11.1, Figure 6-12 of

Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. Refer to Appendix K.2, Avocado Tree Memo, of the Final EIR, for discussion of the avocado tree located at 451 Savoy Street as it pertains to the proposed Project. As discussed therein, based on review of photographs of the avocado tree it is between 30 and 40 feet in height, and the maximum height of any variety of avocado tree is 40 feet. Because the tree's trunk diameter is approximated at 20 to 24 inches, this indicates it is a mature tree and any increase in height would be negligible. The height of the bottom of the proposed Project's cabins adjacent to the avocado tree location is approximately 52 feet above the ground. Based on this information, the Avocado Tree Memo concludes that the proposed Project would have no above- or below-ground effect on the avocado tree, and because of the considerable distance from the tree to the cabin, no pruning would be necessary prior to construction or during proposed Project operations.

Comment PH220-6 Most of the route is on an earthquake liquefaction zone. The mitigation in EIR is to do mitigants or whatever that says. Well, if the mitigation is to drill deeper, that's more noise, vibration, more possibility of groundwater contamination, more damage to our homes and (audio interference) historic El Pueblo.

Response PH220-6 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how the proposed Project would have less than significant impacts with implementation of Mitigation Measures HAZ-A and HAZ-B. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. With implementation of Mitigation Measure VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. Construction of the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project.

Comment PH220-7 Why isn't -- oh, okay, so you know what? This project would be like a cable car freeway over a neighborhood which is already sliced and diced by Hill Street and Broadway. I'm sorry, but the people who are supporting this aren't looking beyond the marketing hype.

Response PH220-7 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Comment PH220-8 This project is as sustainable as an EV Hummer, which is also zero emissions by their standards. It's bloated and completely wrong for the supposed purpose. Go back to the drawing board with this EIR or just stop the gondola. Thank you.

Response PH220-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter PH221 – Speaker 1

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH221

Comment PH221-1 INTERPRETER: I oppose the Chinatown gondola project because Chinatown already has a lot of cars and the Go Line runs through Chinatown as well. I live in the Chinatown senior building, and that's for speaker one.

Response PH221-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter PH222 - Tan

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH222

Comment PH222-1 INTERPRETER: For speaker two, I also live in Chinatown. My last name is Tan. I am over 80 years old. I live near the railway station, and if we have the gondola in the future, this is going to affect our life because building a gondola will produce a lot of dust, noise, and it's going to be a safety issue as well, so I oppose this gondola project.

Response PH222-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project.

Comment PH222-2 If we really need to develop Chinatown, we need to make sure to add more parking for cars that are coming in. This project is for wealthy individuals, and for the benefit of Chinatown, we need to make sure we have enough parking for the public. Thank you.

Response PH222-2 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and

with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment Letter PH223 – Speaker 3

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH223

Comment PH223-1 INTERPRETER: I live in the senior apartment near the Metro station. The address is 808 Spring Street and I personally live in apartment 909.

I have lived here for approximately ten years. A lot has changed over the past ten years. Over time in Chinatown, gradually we lost a hospital and some supermarket.

A lot of visitor going to Chinatown, they are just here to do the shopping, but a lot of them have gone currently, and Chinatown desperately needs the hospital to come back and more stores in Chinatown, and the government needs to think about the need of their people.

Even though I live here, I do most of my shopping, grocery shopping in Rosemead and San Gabriel because it's cheaper there and it's more convenient. I can do all of my shopping there all at once. There are a lot of street vendors in the streets in Chinatown. It's like a third world.

Response PH223-1 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment PH223-2 And Chinatown currently already has an electric bus that is running through Chinatown from the bus terminal, so we don't need the gondola anymore. Thank you.

Response PH223-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium

Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment Letter PH224 - Ling Lee

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH224

Comment PH224-1 INTERPRETER: Thank you. My name is Ling Lee. I also live at 808 Spring Street and I have lived here for –

(Simultaneous speaking.)

Response PH224-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH224-2 INTERPRETER: So sorry about that. My name is Ling Lee and I'm a senior citizen living in the senior apartments too. The address is 808 Spring Street and I have been living there for ten years and I'm 75 years old.

And every time I open my window in my apartment, so the bus line was running through outside, so it generates a lot of like noise and vibrations. It caused me like a headache and I couldn't sleep at night.

Response PH224-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH224-3 So, you want another gondola outside of my building. That's going to basically kill me. So, you mentioned that it would bring more business.

Response PH224-3 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses.

Comment PH224-4 You can just invest on more shops in Chinatown.

Response PH224-4 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH224-5 And so, also the gondola is not, you know, would bring a lot of benefit to us as senior citizens, so, because it's hard for us to like go into the gondola or take the gondola.

And also, it also would cause us some like safety issues, some safety issue in our neighborhoods, so I'm strongly opposed to the gondola project. Thank you.

Response PH224-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins allow for sitting or standing, and would be fully ADA accessible, including accommodating wheelchairs. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems,

for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses, and for discussion of how comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, and beautifying communities. Comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation.

Comment Letter PH225 – Speaker 4

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH225

Comment PH225-1 INTERPRETER: I am very much in opposition of this gondola project. You are talking about this gondola is going to reduce pollution and noise. That is not true. I am in so much opposition of it. A gondola is only used in not-so-developed countries and cities.

Look around us. Look at the world. Only very backwards cities and cities that are not so developed are still using gondola. Look at Beijing. Are they using gondolas? Look at all the very developed countries.

If you want to build a gondola here in Los Angeles, that means Los Angeles is a not-so-developed country. Is that what LA is?

Such way of transportation is obsolete. It's definitely going to bring a lot of negative impact to people. It's going to bring more pollution. It's bad for seniors' health.

Response PH225-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. Refer to Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, which provides examples of gondola systems in cities around the world. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging

innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH225-2 And also, if you put a gondola right there above our window, above our building, the moment we open up our windows, they're able to see everything we're doing inside.

We are sacrificing or you are actually putting our privacy on the line. We would not have any more privacy. I firmly oppose the gondola project.

Response PH225-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment Letter PH226 - Sophat Phea

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH226

Comment PH226-1 MR. PHEA: Hi, my name is Sophat Phea and I have lived in Chinatown for over 30 years and still live in Chinatown today. As there's been a rise of developments and gentrification in Chinatown, I fear this project will contribute to it and put my home more at risk.

Response PH226-1 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH226-2 Parking has been a huge barrier to the small businesses in Chinatown in thriving, including for my mom and her shop. They were told that it would bring businesses to Chinatown, but tell me how.

It is no doubt going to take up a lot of parking spaces in Chinatown where people are already having trouble finding. Even tenants living in Chinatown have trouble finding parking.

Response PH226-2 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH226-3 I personally don't see myself using the gondola and would love the money and effort go toward what the community would actually use instead, such as our current public transportation.

Response PH226-3 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including Chinatown. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH226-4 How much does it cost to ride the gondola? Tell me why no one was able to answer.

Response PH226-4 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH226-5 Money and effort could have been put into improving the parking situation and improving our public transportation instead. At the end of the day, who does it really benefit and who is being harmed? Thank you.

Response PH226-5 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH266-1 through PH266-4.

Comment Letter PH227 - Ernest Lee

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH227

Comment PH227-1 MR. LEE: Can you hear me?

MS. SISCO: Yes.

MR. LEE: Okay, my name is Ernest Lee. I'm the President of the Chinese Consolidated Benevolent Association in Chinatown. We're the oldest Chinese association in Chinatown, with over 130 years of history. We have 27 family associations affiliated with us and we have over 2,000 membership.

We strongly support of this gondola project because definitely it will bring benefit, commercial benefit to Chinatown and the small merchants. Chinatown, like the people said earlier, Chinatown is dying. We need the revitalization, so definitely, please bring on the gondola project. We need it. Thank you.

Response PH227-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH228 - Tany Ling

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH228

Comment PH228-1 MS. T. LING: Hey, Metro. My name is Tany and I'm a Chinatown resident who is against this project. Hey, Metro, if you are serious about making life better for Angelenos, you'd also be against this touristy sweetheart money grab for Frank McCourt.

Response PH228-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH228-2 Metro, if you're serious about reducing traffic and pollution on game days, you would choose practical, cost-effective measures like providing safe pedestrian access to Dodger Stadium and expanding the Dodger Stadium Express by adding more electric

buses and dedicated bus lanes, and creating new boarding hubs in other parts of the city like Griffith Park, the Valley, and the West Side.

Response PH228-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion

to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH228-3 Metro, I support and actively use public transportation, but this gondola proposal is a scam masquerading as a free public service project.

Response PH228-3 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment PH228-4 You all forgot to include the residents and stakeholders when you and LA ART met behind closed doors during what was supposed to be the initial public planning period.

Response PH228-4 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment PH228-5 Then, you held in-person hearings where we could make so-called public comments, but only if we were secreted away in the corner behind a curtain talking only to a stenographer. Metro, I think you have a lot of explaining to do.

Response PH228-5 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during each of the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment Letter PH229 - Sakae Koyama

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH229

Comment PH229-1 MS. KOYAMA: Hi, can you hear me?

MS. SISCO: Yes.

MS. KOYAMA: Thank you. Hi, my name is Sakae Koyama, a born and raise lifelong Angeleno, and have lived in Echo Park/Elysian Park since 1975.

I'm also a board member of Friends of Elysian Park, who have helped protect and preserve Elysian Park from predatory developers since 1965. We have taken a firm stance of no on this project.

Response PH229-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH229-2 We remember our history, Chavez Ravine. We know what gentrification and displacement does to neighborhoods. This will not bring revitalization to Chinatown. They need supermarkets, hospitals, infrastructure. Elysian Park is not for sale.

Response PH229-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities, and have brought benefits to their surrounding areas by

connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment PH229-3 There's a reason that Frank McCourt kept the parking lot after he sold the Dodgers. He had dollar signs in his eyes. As he has steadily raised the parking rates, it has negatively affected the surrounding neighborhoods.

Response PH229-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH229-4 This is not public transit. To where? The parking lot when Dodgers are there seven to eight months of the year when a perfectly good bus system exists? This is only the first phase of McCourt's Disney-fication of Elysian Park, turning it into an amusement shopping center like Universal Citywalk.

Response PH229-4 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response G, No Improper Project Segmentation: The Proposed

Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH229-5 It will ruin the natural beauty of the historic state park and the oldest city park since 1865, Elysian Park, and will ruin the scenic view of downtown. We adamantly oppose this project and it has no place in our community. Thank you.

Response PH229-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Los Angeles State Historic Park and Elysian Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment Letter PH230 - Andy

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH230

Comment PH230-1 PARTICIPANT: Hi, can you hear me?

MS. SISCO: Yes, we can.

PARTICIPANT: Hi, my name is Andy. I've been part of Chinatown for 20 years and I'm speaking against the gondola project.

Respectfully, everyone involved is fucking kidding themselves if you actually think this project does a community good. It's insulting and disrespectful to us if you think anybody living here actually believes this would help Chinatown without first being lied to.

Response PH230-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character

of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer also to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH230-2 Chinatown is not dying. Chinatown is being killed by you people. Projects and corporate greed just like this are steamrolling over our homes just like Union Station in Old Chinatown, just like Dodger Stadium with La Loma, Bishop, and Palo Verde. Trickle-down economics didn't work then, why would it work now? Metro and McCourt clearly have no respect for us.

Your own presentations say that the most you should get out of this project is a merely 20 percent by 2040 in two decades. You won't be able to make a graph that shows how more foot traffic and congestion translates over to a better standard of living, housing, food, and health access.

I hope you all sleep terribly tonight. If your conscience isn't haunting you in your nightmares, it will surely haunt your careers because everybody can see this project is a fucking joke. Thank you.

Response PH230-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Response PH230-1 for an overview of the need for the proposed Project and the proposed Project's benefits to communities along the proposed Project's alignment. Refer to Topical Response N, Environmental Justice, for

discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment Letter PH231 - Rick Garcia

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH231

Comment PH231-1 MR. GARCIA: Good evening. Can you hear me?

MS. SISCO: Yes.

MR. GARCIA: Okay, thank you. My name is Rick Garcia. I'm a sheet metal worker by trade and union organization with SMART Local 105 representing the sheet metal trades in Southern California.

All right, I'm here to support the LA ART gondola project and I'm not ashamed to say that. This project has been open for consideration since 2018 when it was first proposed to Metro's Office of Extraordinary Innovations, and since then, a great deal of traffic and pollution have plagued the area around Dodger Stadium.

LA ART and Metro's gondola project offers significant potential benefits by increasing access to public transit and reducing traffic congestion on local roads.

We are pleased with the changes coming to our city transit via the project and happy for the future of the area around Dodger Stadium. Thank you for your time.

Response PH231-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of how the proposed Project would improve mobility and accessibility for the region. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Comment Letter PH232 - Juniper Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH232

Comment PH232-1 MS. WONG: Hello, my name is Juniper Wong and I'm a community organizer in Chinatown with Power LA and Chinatown Community for Equitable Development, and I oppose this project.

Response PH232-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH232-2 This is supposed to relieve traffic and have zero emissions, but this gondola doesn't take anybody off the road, it just adds. By being a tourism destination, it will just redirect traffic and automobile emissions from Dodger Stadium to Chinatown and the downtown area.

Response PH232-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH232-3 You also say this will improve connectivity for the city of LA. I fail to see that when the transit being proposed is just a mile and a half long. Fans come from all over the city. There's traffic in all directions.

There's traffic in LA all day, every day, but you choose to run this directly through and over one of the poorest areas of Los Angeles, making Chinatown residents suffer for your tragic idea.

Response PH232-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment PH232-4 Every parcel of land this project is slated for is on public land. That land should be used for public good. Chinatown has been deprived of services with no supermarket. You've already heard seniors say that they have to go to San Gabriel Valley to access our cultural goods and foods where there was just a devastating shooting.

Response PH232-4 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate

existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment PH232-5 The people of Chinatown are dangerously under-resourced. The median income is less than $20,000, and like the rest of LA, is in an absolutely crisis for fair housing. Do you really think that when the right to live in one's home and stay off of the street, that the neighborhood's main concern is how flamboyantly they can get to a baseball game?

Response PH232-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Response PH232-4 for discussion of how the proposed Project would not preclude development of uses including housing. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH232-6 Compare the less than $20,000 a year median income with the cost of this project. After donating it to Climate Resolve, they disclosed that the budget will be even more than $300 million. Who will be paying for that? Will it be taxpayer money?

Response PH232-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH232-7 You're telling us you have access to more than $300 million to come into Chinatown and build whatever you want and you won't choose housing? You won't choose life-affirming services, direct stimulus to small businesses? You won't choose the people?

Response PH232-7 Refer to Responses PH232-4 through PH232-5 for discussion of how the Draft EIR addresses environmental justice, the Project Sponsor, and discussion as to the proposed Project's funding. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH232-8 In this draft EIR, you've also addressed alternatives to the gondola. You ruled out buses. There already exists a free shuttle for game days that could be expanded, but your reasoning for not doing that is that in order for buses to fulfill the 5,000 people an hour per direction the gondola would do, you need buses to run every 47 seconds, therefore, that's not an option.

Nobody is asking for buses that run every 47 seconds. We're asking for just some amount of additional buses. You're LA Metro. Why do you suddenly think buses will not work? Stop this project. Thanks.

Response PH232-8 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment Letter PH233 - Patrick Chen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH233

Comment PH233-1 MR. CHEN: Hello, can you hear me?

MS. SISCO: Yes.

MR. CHEN: Hello, my name is Patrick Chen. I'm a resident of Chinatown and I am opposed to this project, and I believe that this draft EIR process has been a total sham.

You have been doing the bare minimum to, quote-unquote, engage the community, which has actually been sunny fantasies of revitalization to suffering Chinatown residents and small businesses, when in actuality, this is nothing more than a cash grab for Frank McCourt and, I guess, the consultants who are working on this project.

Response PH233-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements,

the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH233-2 Poor and working class tenants, the taxpayers of LA, including the constituents of many of these nonprofits that they claim to represent, will be left with the bill.

Response PH233-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH233-3 And some Chinatown legacy groups have claimed for over a decade that Chinatown is dying and needs big, flashy tourism to save it, when they could have been spending their political capital to build up community strength that can sustain itself instead of

begging for billionaires like Frank McCourt to leave them some spare change. This project is not good for Chinatown and I oppose it. Thank you. Thank you.

Response PH233-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH234 - Amy Ho

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH234

Comment PH234-1 MS. HO: Hello?

MS. SISCO: Yes?

MS. HO: Yes, can you hear me now?

MS. SISCO: Yes, we can. Go ahead.

Ms. Ho: Yes, hi, my name is Amy Ho.

I'm a resident of Chinatown for 42 years. Okay, the reason that I live here is because I love the freedom of this country they gave me. I'm one of the boat people who left Vietnam, went to a communist camp. I don't like that. That's why. I didn't like that. That's why I came to, you know, America.

And I thought that, you know, if I work hard, I can have the right to enjoy my life here, but I can't believe the rich. They're trying to, you know, take away the right of me to live at peace.

Okay, now those people who support his gondola, please, please think. Your enjoyment is built on the suffering of the resident people living here.

You know what? I worked hard when I was young. I'm 70, okay. I used to work hard, okay. I worked a full job with two part-time jobs just to get my feet on the ground, to start my life here, and I did that. I'm proud of that, but to think some of the rich people now are trying to take away from that for me.

Okay, I will support this program only if Dodger Stadium stops selling food or beverage in Dodger Stadium. You know what? It will not benefit Chinatown at all. Those fans will go to Dodger Stadium.

They go there, they watch the game, and they eat, they drink. So, why, would they go to Chinatown to drink and eat? No, I mean, they want just to, you know, see how it is, but I know exactly.

Response PH234-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including

potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH234-2 So, this is to the benefit of, you know, Dodger Stadium, not for us, and besides, don't forget that they have only 82 games per year and only a few hours per day. How are they going to, you know (audio interference).

Response PH234-2 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH235 - Larry Jung

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH235

Comment PH235-1 MR. JUNG: Good evening. My name is Larry Jung. I've been involved with Chinatown since, and our family has been involved since, for the last 80 years. My great-grandfather was one of the original founders of New Chinatown, and I also represent the Chinese-American Museum in El Pueblo.

I support the project and I believe that the main idea and concept is valid. I believe that it will bring tourism into the El Pueblo and also into Chinatown.

I've ridden several gondolas in Pittsburgh, in Telluride, and Rio, and it is quite a tourist attraction. I believe that it will stimulate businesses, traffic for the small businesses around Chinatown and the Gold Line, so I am in support of the project. Thank you.

Response PH235-1 The comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses.

Comment Letter PH236 - King Cheung

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH236

Comment PH236-1 MR. CHEUNG: My name is King Cheung and I oppose this gondola project because I believe it's not going to help small business and residents in Chinatown. If the gondola keeps running every day during the hour, it's going to disturb residents' sleep.

Response PH236-1 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. Operational noise impacts would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment PH236-2 And also, we need to be careful because when the gondola is running in the air, people in the gondola may be able to see residents who are taking a shower or using the restroom, so in that case, we don't need the gondola.

Response PH236-2 Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and, as discussed in Topical Response M, Comparable Systems, modern aerial transit systems in other cities, including Portland, Oregon and New

York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH236-3 And I also agree with some of the people who call this gondola project as a scam, because if the Dodger Stadium has hotels, restaurants, Dodger fans will just go there and eat, watch the game, and go home. Why would they bother to go up to the slope and go to Chinatown? They won't.

Response PH236-3 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH236-4 And if Dodger fans wants the traffic congestion to be improved, I suggest them to use the bus because there is a shuttle going from Union Station to the Dodger Stadium, but actually currently, not many people are using this bus and there are only two buses.

If they are not using this free shuttle, why would they bother to pay and use the gondola? So, I believe we don't need this gondola.

Response PH236-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH237 - Dana Martinez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH237

Comment PH237-1 MS. MARTINEZ: Hi, can you hear me?

MS. SISCO: Yes.

MS. MARTINEZ: Hi, good evening, everyone. My name is Dana Martinez (phonetic). And I wanted to say that when we talk about multimodal transit, we probably just think of a few clicks outside a bus, or a train, or a streetcar, maybe even a bicycle, but honestly, a gondola starts to get us in the air.

And, well, when I think of the future or other people think of the future, we might call it sci-fi, but the reality is that we need clean air, zero emission projects to be the first to break the in-city sky barrier.

And when other ideas become realizable, this measure will benefit the community, the traffic, the environment, while also taking into consideration specific populations and their transportation needs.

So, I wanted to say that I'm extremely encouraged by this and ready for the next step for the future of the Los Angeles transportation journey. Thank you.

Response PH237-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH238 - Charly Ligety

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH238

Comment PH238-1 MR. LIGETY: All right, great, thank you for hosting this dialogue. I am Charly Ligety. I am a resident of Echo Park, pretty adjacent to the stadium, and I own a home nearby, raising a family.

And, you know, I'm kind of thinking of this from the perspective of respecting all of the people that have come before me in this neighborhood and me only being here for, you know, a few years, but also thinking kind of long term of just where I want LA to grow and be more visionary about how to bring people together and move around this community or move in and out of this community.

I think the gondola is a great first step in that kind of vision. I support it because it reduces traffic. You know, with baseball, there's too many games, 80-plus games a year, and the most unfortunate thing is all of the cars.

Response PH238-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH238-2 Beyond games, you know, I think the access the gondola will provide for park access to Elysian to millions of people just based on streamlining access between Union

Station and the park will be a huge kind of component that we're not even thinking about as a benefit beyond just Dodger access.

And, you know, it really elevates our medium of coming together and bringing a new class of people into the public transit world, especially here in Los Angeles. Gondolas are sexy. Buses are not.

Response PH238-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH238-1 for discussion of how the proposed Project would improve mobility and accessibility for the region. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment PH238-3 You know, I come from ski town where many gondolas are located. They're quiet, they're comfortable, they're exciting. They cost $10 million to $15 million a mile, so they're not expensive. Hopefully, we'll probably inflate that a lot with all of the costs being in Los Angeles.

Response PH238-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH238-4 But the couple of suggestions, I think there should be an affordable housing requirement with this either around the station or somewhere nearby to create sort of a gondola-oriented development incentive.

Response PH238-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for

discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment PH238-5 And then better renderings, at least a satellite imagery, a shape file, and a Google Earth file would be great just to like sort of show this better of how it works, and then also pairing the gondola with street closures along Scott and other places so there's sort of a carrot and stick approach to getting people out of their cars and into the gondola so it actually guarantees reduced traffic. Thank you.

Response PH238-5 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR and Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment Letter PH239 - Joe Rincon

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH239

Comment PH239-1 MR. RINCON: Hello and good evening, everyone. My name is Joe Rincon (phonetic). I want to talk a little bit about Chinatown.

Chinatown has a population of over 30,000 people, and considering the actual size, that's pretty dense, and whether people walk, take bikes, carpool, Uber, take trains, buses, subways, or cars, that's 37,000 people moving around at or below ground level, so it should be no problem for us to imagine transportation that gets everybody off the ground.

Response PH239-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH239-2 And realistically, it's not just Chinatown. This project will impact the traffic and daily commute of Angelenos from the areas near Dodger Stadium, Mission Junction, Elysian Park, Solano Canyon, and the LA State Historic Park, not to mention traffic in and around Union Station itself.

We are sick and tired of super congested cities, and the people of not only Chinatown, but all over LA believe in the future of aboveground transit. LA, it's time to set our minds on things above. Thank you very much.

Response PH239-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Given the capacity of the proposed Project's system, approximately 20 percent of Dodgers fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment Letter PH240 - Melanie Bellomo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH240

Comment PH240-1 MS. BELLOMO: Hi, thank you. My name is Melanie Bellomo. I am a resident of Lincoln Heights. I am here to say that we stand with the residents of Chinatown voicing strong opposition to this project. I echo the sentiments shared so bravely tonight.

Response PH240-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH240-2 I also want to point out that this furthers the harm on the descendants of La Loma, Palo Verde, and Bishop, otherwise known as Chavez Ravine. To further commercialize this area where there has been no moves toward reparations for these people who were forcibly removed from their homes and had their communities destroyed is wrong.

Response PH240-2 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH240-3 I also ask for a public apology for the false narrative being pushed regarding the initial meeting for so-called public comment. It was nothing of the sort, and the disruptions you referred to were people of this community taking their power back and making the public comment time they were promised.

This meeting is inequitable considering the advanced age and lack of access for comments from the majority of Chinatown residents.

Response PH240-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during each of the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental

justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility.

Comment PH240-4 Lastly, I want to point out that the man at the helm of this disaster, Frank McCourt, as we all know, everything he touches turns to shit while he makes a fortune. This project will be no exception.

Response PH240-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH241 - Alejandro Campillo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH241

Comment PH241-1 MR. CAMPILLO: Hello, my name is Alejandro Campillo and I'm talking in opposition of the gondola.

I'm going to be reiterating some points, but they're important, one of which is that this is not going to reduce the amount of pollution because there's still going to be people driving to Dodger Stadium, to Chinatown, and I think that this project is just a way to keep money in the hands of the rich and keep money outside of the hands of Chinatown residents.

Response PH241-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH241-2 I also think that this is a waste of taxpayer dollars. If we're going to be using public land, it should be used for public good, right? And Chinatown needs so many other amenities such as a grocery store, a hospital, perhaps even better parking.

There's a long list and a gondola is definitely not something that is at the top of that list. In fact, it shouldn't even be on the list, so I stand against the gondola.

Response PH241-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment PH241-3 And I just wanted to say about the previous meeting with public comment, the public comment was being held not as public comment, but there was literally -- it was in the corner of the gymnasium. There was a curtain. It was the antithesis of public comment.

So, I just wanted to say that I'm very disappointed in you guys for not allowing that, and I'm happy you had one today, but there should be more in the future so that people can actually voice their comments. I yield the rest of my time. Thank you.

Response PH241-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on

forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment Letter PH242 - Julie Rico

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH242

Comment PH242-1 MS. RICO: Hello, can you hear me?

MS. SISCO: Yes.

MS. RICO: Hi, my name is Julie Rico. I'm a real art person and an active resident in Chinatown. I'm vehemently opposed to the gondola project. The people that have spoken today in favor of this project do not live in Chinatown. I live here.

Response PH242-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH242-2 I know that the 3,000 cars that will be displaced from McCourt's parking lots will be sent down here to Chinatown where they'll be roaming around looking for parking spaces, trouncing around on our neighborhoods, spreading disease to our senior community, launching garbage all over the place, trouncing on our neighbors, disturbing the historic state park and the animals and the birds that are trying to live there.

Response PH242-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. The Parking Study determined that even with the addition of proposed Project vehicles parking in the area studied, publicly available parking on a game day would still be substantial, with an estimated 43 percent parking occupancy across the two half-mile station walksheds, and over 3,900 off-street parking spaces available to the community. The proposed Project would include a parking management plan prepared in collaboration with the City, who

would implement any on-street parking management strategies, and with robust feedback from community stakeholders to inform development of the plan. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment PH242-3 Yes, there are people excited about this project. They are talking with dollars in their eyes. We, in the community, are looking for elements to shore up our community with low-income housing, creative services, health and human services, a grocery store, and other benefits that will definitely benefit us.

I know a lot about business. This is what's going to happen. McCourt will build them all at the top of the hill, and the lots where he's displaced the 3,000 cars that will come down into Chinatown, and people will spend their disposable income not in Chinatown, but in McCourt's parking lot.

Chinatown will be devastated both socially and financially. It is a crying shame that anybody believes the lies coming from LA ART or anybody that wants to support this project. Thank you.

Response PH242-3 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, this new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers

to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter PH243 - Iran Carranza

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH243

Comment PH243-1 MS. CARRANZA: There I am. Can you hear me?

MS. SISCO: Yes.

MS. CARRANZA: Okay, so for context, I grew up in Lincoln Heights in the '80s and '90s when LA State Historic Park was an ugly, empty field, and so I was so happy when I was able to buy my home in Boyle Heights in 2020 and I saw that now it's this beautiful public space.

And I absolutely love LA. I'm an Angeleno through and through. And I thought how wonderful that people have this with their families to enjoy, to exercise, to go to concerts, and it's right in our very own backyard.

I feel like we don't have enough beautiful green space like this and I would hate to see it ruined by an eyesore like this proposed gondola, so I am against the project. I feel like can we just have something nice and not allow private interests to ruin it for us?

Response PH243-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of how the proposed project would have a less than significant impact to aesthetic and visual resources, including at the Park.

Comment PH243-2 I want to address some of the points that other commenters made. Gondolas as cutting edge, so aerial gondolas first appeared in the 1900s. There's nothing cutting edge about gondolas. It's not new technology. It's nothing, you know, cutting edge about it.

Gondolas as tourist attractions, LA has awe-inspiring tourist attractions already. Like, a gondola does not hold a candle to what we already have. Gondolas are for Disney World in Florida. It's tacky.

I can see why a place like Spokane might need gimmicks like gondolas to give people something to do, but LA has a lot more to offer. We have culture. We have history. We have a lot of attractions.

Response PH243-2 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from Los Angeles Union Station (LAUS) to Dodger Stadium would be approximately seven minutes. As in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH243-3 The idea of the gondola as a public transportation solution and traffic congestion relief on game days, surprise, I'm a Dodger fan. I had season tickets last year and I took the Dodger bus. We're not all bad. So, I can tell you the people who are in cars now are going to stay in cars. A gondola is not going to change that.

The people who figured out how to get to Union Station and are already taking the Dodger shuttle are going to continue --

Response PH243-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on

the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit, parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data. Many of the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data.

Comment Letter PH244 - Albert Holm

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH244

Comment PH244-1 MR. HOLM: Hi, this is Albert Holm, a born and raised Angeleno. I strongly oppose this project.

At its core, it is a personal pet project proposed by a white billionaire, Frank McCourt, who has a history of being scumbag, and it is a project that will negatively impact and has absolutely no benefits for the low-income, working class communities in and around Chinatown.

Response PH244-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH244-2 The very well-respected and objective UCLA Mobility Research Team recently published a report that concluded that a gondola would have virtually no impact on traffic on Dodger game days.

So, in return for destroying the lives and dignity of working class communities in and around Chinatown, in return for taking away green space from the LA Historic State

Park that's currently used and enjoyed by many every day, in return for building an ugly project that will ruin everyone's view of the skyline when they look up, you get a gondola that will have virtually no impact on traffic or carbon emissions.

Response PH244-2 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project's Draft EIR, and does not appear to have been prepared for that purpose. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of how the proposed project would not have a significant impact to aesthetic and visual resources, including at the Park. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH244-3 And you get to enrich the scumbag, Frank McCourt's, pocket, because we all know the point of the gondola is to spur development of retail and entertainment complexes on the Dodger Stadium parking lots that are owned by Frank McCourt.

If that happens, then Dodger Stadium will become a year-round destination which will just increase the amount of traffic and carbon emissions overall throughout the year, so instead of traffic for 82 days a year when the Dodgers are playing, you get traffic every day of the year, which will increase carbon emissions and increase pollution.

Anybody who believes otherwise is either being very disingenuous, very dishonest, very ignorant, or they don't live here, because they don't care what happens to other people.

Response PH244-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit,

a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter PH245 - Liliana Cortez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH245

Comment PH245-1 MS. CORTEZ: Yes, hi. Thank you for calling. The irony of when you called on me earlier is that I was on the bus and couldn't answer due to how crowded and noisy the bus was because it was running late.

I find it really funny to hear many of you talk about how this gondola project will bring public transportation to Chinatown and reduce traffic in the area, but really, how many of you are really willing to get out of your cars and ride public transportation and deal with the late schedules, overcrowding, rude bus drivers, and dirty buses and trains due to lack of cleaning and sanitation on a daily basis?

I ask because I'm also a cyclist and many of my friends and I ride our bicycles not just for fun like many of you might think, but as actual daily commuters who use these roads and streets to get from point A to point B, from home to work, to school, to running errands, always under the risk and threat of whether we'll make it home alive.

How many of you are willing to get out of your cars and deal with traffic noise, toxic exhaust fumes from vehicles, and traffic violence, or have you missed the news of continuous assaults that have led to hospitalization and death for us cyclists?

Of course, you're not. You're sitting here being hypocrites about the benefits of this project for public transportation and traffic. I call balderdash.

Response PH245-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, and Topical Response N, Environmental Justice, for discussion how the proposed Project would address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH245-2 The quiet streets that my friends and I used to ride our bicycles to enjoy the beautiful views of the Elysian Valley, Angel's Point, and the LA Historic State Park would be filled with entitled tourists and drivers who already use violence to push us off the streets with the racism and death machines.

Response PH245-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH245-3 But obviously, some of you here feel we are not entitled to this as residents and patrons of these green spaces, and this is why we are against this project. Metro can start by improving the existing transportation system because this gondola project is not even part of the solution.

Response PH245-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment PH245-4 The gondola in Mexico City was built for the white American colonizers invading the city because of how cheap it is, while outpricing locals with exorbitant rents. For the caller who was gushing over this, this is called gentrification and this is exactly what this project will bring to Chinatown and the surrounding communities.

Response PH245-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH245-5 Chinatown is not dying. It's lacking real community investments and this gondola project is not one of them.

Long-term residents of Chinatown are mostly monolingual elders, seniors, and families with young children. They are immigrant, low-income, and facing continuous harassment and threats of eviction.

Response PH245-5 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Comment Letter PH246 - Jennifer Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH246

Comment PH246-1 MS. WONG: Hi, my name is Jennifer Wong. I am a resident of Chinatown and I oppose this project.

I actually find it to be kind of racially traumatic that this is going on, that you are ignoring marginalized communities, the Asian-American community, thinking that we would just kind of take this without comment and sitting down, so I really hope you take that into consideration the next time that you propose ridiculous projects.

Response PH246-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and the proposed Project provided translated materials in four different languages, and interpretation services in five different languages, to reflect the surrounding community, and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features.

Comment PH246-2 I don't feel like this will help with our traffic issues. I liked that idea where you need to have shuttles, not just going from Union Station, but other parts of the city. That makes sense to me.

Response PH246-2 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a

permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH246-3 In terms of it bringing business into our community, I don't believe that's true. It would just bring businesses that are expensive and would not be affordable to the residents here.

What we need are things like a laundromat, a grocery store, and I don't believe tourists or people who would ride the gondola are going to be using any of those types of things, so it doesn't make any sense at all.

Response PH246-3 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional

visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment PH246-4 I also really enjoy the state historic park and I don't want to see a gondola as I'm trying to experience nature, take walks, and enjoy my community. So, I really do hope you just do not go along with this project. Thank you.

Response PH246-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park.

Comment Letter PH247 - Fernanda Sanchez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH247

Comment PH247-1 MS. SANCHEZ: Hello, my name is Fernanda Sanchez and I am a long-time community member of Lincoln Heights. I'm here in solidarity with the residents of Chinatown and I strongly oppose this disgraceful project.

Response PH247-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH247-2 The lack of transparency from these predatory projects will continue to be faced with opposition from all of our community members here. It is the residents of Chinatown that need to be heard because they are the ones that will be directly impacted.

Response PH247-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown/State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment PH247-3 I can list a million other things our communities need and a gondola is not one of them. I want to also highlight the violent gentrification that is happening to our communities directly caused by USC and the Dodgers.

They have taken our parks, our neighborhoods, our homes, our lives. Gentrification is death. Our community continues to be targeted and it's time that we take our city back from the greedy hands of the top one percent who treat our communities like they're profitable playgrounds.

Response PH247-3 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project would not preclude development of other uses in the surrounding communities and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would also benefit the surrounding community by improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH247-4 I also want to mention that for those that are speaking in favor of this project, if you really believe that this gondola will improve traffic and reduce emissions, you are seriously confused for believing such a blatant lie and logical fallacy, or you are being paid to speak in favor. If you have a contract riding on this gondola and you're speaking in favor, you need to be transparent about that.

Response PH247-4 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH247-5 Lastly, I want to comment on the community advocates and activists who spoke up during the last gondola hearing where there really wasn't any public comment because the developer did not want to listen to us.

I want to thank all of the brave voices and their efforts for giving us the opportunity for public comment and for the meeting today.

Response PH247-5 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public

review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. During the January 12, 2023, public hearing at Cathedral High School, attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023, public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment PH247-6 I urge you to stop this project. Stop the gondola. Nobody here in these communities supports this project, and we will not accept developers to further exploit, destroy, and displace our communities. Thank you.

Response PH247-6 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH247-1 through PH247-5.

Comment Letter PH248 - Cheng Yang & Yu Hang Tang

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH248

Comment PH248-1 MR. YANG: Hello.

MS. SISCO: Hi.

MR. YANG: Hi, this is Cheng Yang. I'm here at Cassia Manor. I have the President of Cassia Manor, Mr. Tyru Hung. He will be speaking on behalf of several residents.

MS. SISCO: Okay. Could you please ask him to move closer to the speaker, and we'll restart the clock?

MR. TANG: (Foreign language spoken.)

MR. YANG: Thank you.

MS. SISCO: Okay. We'll provide a moment for the interpretation of that comment.

INTERPRETER: Hi. My name is Yu Hang Tang (phonetic), and I am speaking here on behalf of ten other residents who are with me right now.

I live at 917 Cafe Manor. I have lived here for over 22 years. Besides me, there is also residents from Unit 402, Unit 604, Unit 610, Unit 112, as well as Unit 508.

We all believe we don't need this gondola. I live on the ninth floor.

Response PH248-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH248-2 If the gondola is going to fly over our home, the people on the gondola will be able to see us change, and for this reason, I oppose the gondola.

Response PH248-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be

located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH248-3 We don't need the gondola. What we need is hospital, supermarket, and affordable housing.

Our community will not benefit from this gondola project. It will only bring harm.

So, I urge this project to be withdrawn. Please remove this gondola project.

Thank you.

Response PH248-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer also to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby residential and open space uses, have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety, and have been shown to reduce violent crime in nearby areas. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed

Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment Letter PH249- Edwin Li

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH249

Comment PH249-1 MR. LI: Hello. My name is Edwin Li. Can you guys hear me?

MS. SISCO: Yes.

MR. LI: All right, thank you.

My name is Edwin Li, and I'm a local resident of Chinatown. And I live near the proposed pivot point of the gondola, and I oppose this project.

I don't believe the gondola will help Chinatown businesses because the tourists would be flying over Chinatown, right into Frank McCourt's parking lots.

Response PH249-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH249-2 I believe the Dodger Express, which is actually more practical and less invasive, will be a better solution. It also economically more responsible and doesn't destroy the neighborhood.

Response PH249-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's

underlying purpose of providing a permanent direct transit connection between Los Angeles Union Station (LAUS) and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH249-3 I think it's wrong to use public funds to help a private company, especially Frank McCourt, and

Response PH249-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH249-4 I don't think it's safe to build objects that are flying over people in earthquake zone areas. And I think that's it for me. Thank you.

Response PH249-4 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet applicable standards, requirements, and building codes, including all standards addressing environmental factors such as seismic effects, and would have less than significant impacts related to geology and soils with implementation of Mitigation Measures GEO-A and GEO-B.

Comment Letter PH250 - Luis Guerrero

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH250

Comment PH250-1 MR. GUERRERO: Hello, can you hear me?

MS. SISCO: Yes.

MR. GUERRERO: Hello, my name is Luis Guerrero. My family is from the Williams Mead Projects, and we are calling support of the gondola.

Response PH250-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH250-2 We've seen that this is going to help alleviate the traffic in the neighborhoods, but I was actually calling as well because the last meeting I tried to go to to give a public comment, I got stopped by protestors, and I had, like, my family with me. I had little kids with me. They were cussing and, like, literally got in my face.

I didn't know if Metro had security there or what, but that was extremely disgraceful, especially considering that was at a school, and there was high schoolers and other kids just everywhere. That was just -- I was so ashamed of Metro and the city right there. That was awful, but thank you, guys.

Response PH250-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the January 12, 2023, public hearing at Cathedral High School, attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR. After the protesters left, Metro staff concluded the

meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023, public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment Letter PH251 - Miguel Castellon

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH251

Comment PH251-1 MR. CASTELLON: Hello?

MS. SISCO: Hello. We can hear you.

MR. CASTELLON: All right, good evening. My name is Miguel Castellon and I am with the Ironworkers Local 433.

I love this project and appreciate that it will be built with partnership with labor. That means good paying jobs for our community and new, modern transportation for everyone.

We need more zero emissions and infrastructure in Los Angeles.

Thank you.

Response PH251-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the LA/OC Building and Construction Trades.

Comment Letter PH252 - Richard Rojas

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH252

Comment PH252-1 MR. ROJAS: Good evening. My name is Richard Rojas. I currently serve on the Advisory Board for Latino Outdoors.

We're a national organization that connects youth and families with the outdoor space, including Los Angeles State Historic Park. Our organization vehemently opposes the project as we see it another environmental injustice in this community.

Response PH252-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH252-2 through PH252-5.

Comment PH252-2 As currently proposed, the project is viewed by our community as an availed attempt to degrade the land that was hard fought and promised to be the Central Park of Los Angeles.

For seven generations of Californians and beyond, recognizing the need for green space in LAs urban area, three great environmental warriors dedicated their lives to finding a way to create this open space in the industrial-commercial wasteland of Northeast Los Angeles.

The work of the late Robert Garcia from the city project, Ted Jackson from California State Parks Operations, Ron Schaefer from the LA Parks District, now all deceased but not to be forgotten, but cherished, protected, and preserved.

Response PH252-2 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer also to Topical Response C, Project Features, for discussion of how the proposed Project would provide open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. Refer to Response S2 regarding the Los Angeles State Historic Park.

Comment PH252-3 We want LA State Park for the viewshed and the experience for the community it provides. It took 20 years to be envisioned and developed, not to rely on the Draft Environmental Impact Report that the state park should change the general plan to accommodate this private venture.

Response PH252-3 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment and Lighting Study of the Draft EIR, and Appendix H.1, Memo Regarding Preparation of KOPs, of this Final EIR, for discussion of how the proposed project would not have a significant impact to aesthetic and visual resources and how view simulations were prepared and analyzed. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment PH252-4 This is not public transportation. It seeks to get people to Dodger Stadium for a private interest, for a private profit.

Response PH252-4 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH252-5 On behalf of the Latino community and current future park users, we urge you to instruct the project proponent to properly identify, analyze, and mitigate all park impacts required by law and not usurp the legal responsibility to provide a clear, thorough, and complete, defendable project in the Draft Environmental Impact Report.

Response PH252-5 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH252-1 through PH252-4. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Draft EIR clearly defines the potential requirements to implement the proposed Project's Chinatown/State Park Station, which would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The

Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment Letter PH253 - Dahma Cho

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH253

Comment PH253-1 MS. CHO: Hi. Can you hear me?

MS. SISCO: Yes.

MS. CHO: Okay. My name is Dahma Cho. I'm a resident of LA. I'm calling in solidarity with the Chinatown community in opposition to this gondola project.

Response PH253-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH253-2 This project is another case of profits being prioritized over the people, of private interests, of those more privileged being prioritized over the well-being of marginalized communities.

Response PH253-2 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment PH253-3 Also, this project is an extension of the harm that Dodgers and Frank McCourt inflicted on the local communities, including the people of the Palo Verde, La Loma, and Bishop communities that the Dodgers corporation forcefully displaced.

Response PH253-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH253-4 This project just serves Dodgers fans and other parties who have some kind of profit to gain from this project, not the actual communities that this project would be impacting.

Previous speakers have mentioned the importance of tourism for the health of the economy, but I think the well-being of the actual community members is more important.

The aging, low income Chinatown community does not need Dodger fans and tourists coming into their communities. They need actual resources like affordable, accessible grocery stores, green spaces, safe, affordable housing, and this project would only contribute to ongoing gentrification of Chinatown.

The people and their needs have been neglected by Metro in this process.

Response PH253-4 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH253-5 Regarding the environmental impact, it just seems to be moving traffic and air pollution from one place to another, not really -- and in that regard,

Response PH253-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response N, Environmental Justice, for discussion of the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH253-6 Climate Resolve and LA Art Metro all seem to be greenwashing this project, making it seem like it would be environmentally beneficial when it doesn't actually, it won't actually be.

Response PH253-6 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization

dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH253-7 Metro, you all are not being transparent, and you're being very deceptive throughout this process. I think Metro should focus on getting rid of their fares, considering it also costs more for them to keep it running, than moving forward with a project like this that just isn't public transit. It does not meet the transportation needs of the Chinatown community.

Thank you.

Response PH253-7 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH254 - Billy Yates

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH254

Comment PH254-1 MR. YATES: Hi, this is Billy Yates (phonetic). I am the former bilingual Mandarin and English civics instructor at the Chinatown Library, and I maintain a close relationship with a lot of my students who live and work in Chinatown.

I'm also a transit rider because I don't have a car. Everything is bike, bus, or Metro for me, and that's why I feel that this scam of a gondola is really deceptive.

And we want to talk about, oh, we should be respectful. Oh, we should do all these things. But public transit riders are disrespected every single day in this city. We are not thought of as actual people, and we know that because of the head wait times, and how dirty it is, and the lack of service, including, if we just get, you know -- taking on like a project like this when we already have so many existing problems with public transit in this city. It's like a glittery band-aid that we want to put on for all these little things, and it's just not a real solution.

What people need are frequent times to be able to move around in LA with public transit. People need free transit so that more people can use it because it takes more time, when the bus is already late, to go and add another person who's looking for change.

Response PH254-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator.

Comment PH254-2 You know, there's so many problems that we could be focusing on with all this money, and the fact that we're thinking about a toy gondola is just -- it really is not the best

of us. And I want LA Metro to do so much better because I know we can be a much better city if we really just prioritize the least among us and made it a public transit.

Response PH254-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodgers games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH254-3 Not some dude over here from Colorado or whatever talking about buses are sexy and he comes from a ski town. That's not the community. Please, please, please let's focus on helping people as much as we can, and that starts with real public transit, and getting rid of this gondola, and focusing on what people need.

Response PH254-3 Refer to Response PH254-2 for discussion of how the proposed Project would operate daily to serve existing residents. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger

Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

Comment PH254-4 Thank you very much. There's a lot of other concerns with transparency and environmental pollution, but we don't even need to go there. Let's just start with the basics.

Thank you, and I know we can do better.

Response PH254-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter PH255 - Camarillo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH255

Comment PH255-1 MR. CAMARILLO: Hi. Thank you so much.

I just wanted to express my opinion and say that this gondola project is completely unnecessary and shameful. It's a luxury project designed by the privileged for tourists and outdated, parlor, aging Dodger fans.

Response PH255-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH255-2 We can hear the desperate concerns of the local generations of the people who live in Chinatown. Listen to the seniors, listen to the families, and make their concerns valid. Provide value to the opinions of people who will be most affected by this money grab project.

And also, don't be foolish. Chinatown has had lowered foot traffic from tourists over the years, but this gondola project is just not the way to acquire more foot traffic. It's truly a scam. Invest in existing shops, invest in Chinatown's business, and invest in Chinatown itself.

Response PH255-2 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH255-3 By the way, how can Metro fully focus on the success of this gondola project when Metro cannot even clean their buses properly?

Response PH255-3 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's operations, including maintenance.

Comment PH255-4 This gondola project will not eliminate traffic, instead provide one of various existing ways for fans to see a baseball game.

Response PH255-4 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions,

and to reduce greenhouse gas emissions through reduced vehicular travel. The opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of attendees of games or events at Dodger Stadium to ride public transportation.

Comment PH255-5 Stop valuing money and tourism over long-time Los Angelenos and our well-being. This gondola project is completely disingenuous and unnecessary.

Response PH255-5 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses PH255-1 through PH255-4.

Comment Letter PH256- Monica

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH256

Comment PH256-1 PARTICIPANT: Yes, hi. My name is Monica, and on January 12, I attended the meeting at the Cathedral High School in LA and supported the gondola project.

And there were some protesters there, and they took over the meeting. I was so disappointed in how the meeting turned out. The protesters were shouting profanity and using bad language in front of the children attending the meeting, and most of all, it was in a Catholic school.

Protesters had no respect for the community nor the people attending the meeting. They were so loud and obnoxious that we were not able to provide public comments on the day of January the 12th. I felt scared and threatened by these -- by the way these protesters were acting.

Response PH256-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment PH256-2 Me and the community, we approve the gondola project. I believe it's a very perfect and new, exciting way to Chinatown -- to come, allow meaning. There's going to be more jobs, more profit for the community as well.

And like I said, I approve this project. Please, please approve it.

Response PH256-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional

transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter PH257 - Bill

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH257

Comment PH257-1 PARTICIPANT: Hello?

MS. SISCO: Yes?

PARTICIPANT: Can you hear me okay?

MS. SISCO: Yes, we can.

PARTICIPANT: My name is Bill. Oh, excuse me. Yes. I live in the neighborhood, and I support the proposed gondola project. We need new transportation in our community that are good for the environment and that don't have emission problems.

So, please vote for it. I support the gondola project. Thank you very much.

Response PH257-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH258 - Angelica

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH258

Comment PH258-1 PARTICIPANT: Hello. My name is Angelica, and I support the gondola.

Response PH258-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH258-2 I also want to add that I'm really upset that the meeting on January 12 was so disrespectful to the community. We have no place in the community for profanity, threats, shouting at people, and disrespecting.

I protest something myself, but I didn't like that and I found it scary enough to attend another meeting because, just because a lady said that she was supporting the gondola, there was this man chasing her around with his hand raised up like he was going to slap her, just because she said that she supports the gondola. He told her, why are you supporting it? You can't be doing that.

I got scared. I wanted to get away from there. We can't let this happen again. I don't know if Metro -- why they allowed the protesters to take over the community meeting and create a terrible environment for other people that were there with their families. Also, I don't understand why they were jumping around the gym and, you know, trying to create panic to the people.

Like I said, I'm here to support the gondola, and thank you for listening

Response PH258-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment

station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with "Stop the Gondola" signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group's loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protesters, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR. After the protesters left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment Letter PH259 - Annie Shaw

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH259

Comment PH259-1 MS. SHAW: Hi. Can you hear me?

MS. SISCO: Yes.

MS. SHAW: Okay. You know what is scary? The violence of gentrification, when a white developer can come in and unleash an entire project on a poor community that is in need of the most basic, essential living.

This is a shameful project that will kill the remaining of Chinatown. It is truly shameful that in 2023, we still have organizations, unions, and museums who are willing to sacrifice poor peoples' survival in exchange for their own community benefits.

Let's be real: if this gondola was proposed in a wealthy, white neighborhood like Beverly Hills or Malibu, it would have ended yesterday. This is a racist, white elephant project that takes advantage of disenfranchised poor people who are fighting for their last survival.

Response PH259-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby residential and open space uses, have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety, and have been shown to reduce violent crime in nearby areas. Additionally, refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site

specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH259-2 Let me be clear. The gondola will not save Chinatown. Tourism has not saved Chinatown. New businesses that do not serve working class community will not save Chinatown.

Response PH259-2 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local Chinatown businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH259-3 The gondola is a white elephant project that wastes valuable resources, gentrify community, increase pollution, and make parking and food and housing even more expensive. Stop imposing this project on the community when the community have said it again and again that we don't want this.

Response PH259-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Also refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/ Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Parking is not required to be analyzed under CEQA or the

Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. The proposed Project would include a parking management plan prepared in collaboration with the City, who would implement any on-street parking management strategies, and with robust feedback from community stakeholders to inform development of the plan.

Comment PH259-4 Entire community of seniors protested your recent hearing. And how dare you? You raised their concerns by calling it a disruption when you are actually disrupting their homes and ignoring their voice of concern.

Response PH259-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023, public hearing were deemed timely submitted for the purposes of the Draft EIR public review period. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including how the Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment PH259-5 Right now, everyone is facing evictions and horrifying living conditions in Chinatown. This money can be used so much more constructively for peoples' lives in Chinatown, for their survival, instead of creating a project that a community can't even afford to participate.

Response PH259-5 Refer to Response PH259- 1 for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH259-6 Once again, residents of Chinatown do not need these boxes above their heads and they do not need their neighborhood to be.

Response PH259-6 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential uses, including parks and other recreational facilities. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown, as well as providing an accessible and affordable mobility option for employees and area residents.

Comment Letter PH260 - Maria Cervantes

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH260

Comment PH260-1 MS. CERVANTES: Hi, my name is Maria Cervantes (phonetic). Can you guys hear me?

MS. SISCO: Yes. Sorry about that. Yes, we can.

MS. CERVANTES: My neighborhood has some of the worst traffic and pollution in the LA County. We want to -- we're deserving, we want cleaner air, less traffic, and more zero emission transportation opportunities.

This project is about less cars, less pollution, and safe and healthy -- safety and health of the neighborhood. I support the project stated gondola.

Response PH260-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH261 - Edgar

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH261

Comment PH261-1 PARTICIPANT: Okay. Hi, my name is Edgar. I'm a local resident, and I just wanted to say that I support the gondola project.

I think, like some others have said, it is definitely one of the ways we go into the future with transportation, just provide different modes of transportation to different areas of the city.

This will connect the local parks and hopefully relieve some of the traffic to get into Dodger Stadium.

It's zero emission, no electricity. So, I think it'd be, you know, a nice way to get up to that area. I support the gondola project and ask the council to do the same.

Thank you.

Response PH261-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH262 - Lynn Dwyer

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH262

Comment PH262-1 MS. DWYER: Okay, I think I'm here now.

MS. SISCO: Yes, you are.

MS. DWYER: My name is Lynn Dwyer (phonetic). I would like to document my concerns that the project will have long-term, negative environmental impacts to parks, historic sites, and residents.

The gondola system will have a negative impact on some of Los Angeles' most iconic views, including streetscapes, historic sites like Union Station in El Pueblo, and parks, including the Legion Park and LA Historic Park.

The project will negatively impact the environment during construction with air pollution, traffic, and noise.

Response PH262-1 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.5, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant.

Comment PH262-2 The ongoing operation of the gondola will disrupt park users and residents with noise, trash, and visual distractions.

There will be an invasion of privacy.

I believe a better solution would be safe pedestrian access to Dodger Stadium.

Thank you.

Response PH262-2 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment Letter PH263 - Valerie Morishige

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH263

Comment PH263-1 MS. MORISHIGE: Hello. My name is Valerie Morishige (phonetic), and I just want to say thank you to everyone that's been providing public comment here. It's been very illuminating, since what's been going on in the press about this has been green washing and kind of astroturfing at best.

So, when I first heard about this project, I thought it was dumb, and now that I'm hearing from community members, I realize how heinous it actually is.

So, they're trying to sow class division to shove this through, and we're just supposed to stand by and not listen to the community? It's absolutely ludicrous.

Tourism is not going to save us, and we see how up and down that tourism can be, especially since the COVID-19 pandemic. So, that -- I don't think we should be trying to rely on that as a stable source of income for folks.

Response PH263-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park,

Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. As detailed in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles.

Comment PH263-2 And regarding the quality of life issues, I think that takes precedence over trying to build, like, another LA Live that -- or, like, a super-mall that's on top of a hill that only out-of-towners are going to go to. And it's not going to help any of our community members at all.

So, I say, down with the gondola. It's dumb, and thank you very much for everyone that's here and providing comment.

Response PH263-2 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment Letter PH264 - Paul Des Marais

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH264

Comment PH264-1 MR. DES MARAIS: Hello, can you hear me?

MS. SISCO: Yes.

MR. DES MARAIS: Hi. My name is Paul Des Marais, and I'm a resident of Lincoln Heights and a former resident of Solana Canyon, and I'm speaking today in opposition of the gondola.

Response PH264-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH264-2 It is a horrible idea, and as someone who is primarily a pedestrian, transit rider, and cyclist, getting to Elysian Park, LA State Historic Park, and around the Chinatown area is very difficult.

There are barely any bicycle lanes in Elysian Park, there are barely any bicycle lanes to get to LA State Historic Park, and like previous speakers have said, bus waiting times and Metro waiting times are insane.

Response PH264-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment PH264-3 This project does not prioritize the residents of Chinatown. It does not prioritize the residents of surrounding neighborhoods. It's just a cash grab, and I believe that Metro should be spending their time, resources, and dollars on improving existing public transportation networks.

Response PH264-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH264-4 There needs to be more Dodger Express buses to the park, to Elysian Park, and if you look at any game day, or any day, really, in Elysian Park, it is a playground for cars. It is not a playground for people.

It's difficult to walk around Elysian Park without having cars speeding past you, speeding to get to the games, and there are barely any bike lanes. And just recently, the main road to get into the stadium was repaved. Not a single bike lane was added to that road. It's disgraceful.

Response PH264-4 This comment is noted and will be provided to the decision Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space

enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program, and individual bike lockers to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Comment PH264-5 Thank you very much, and I stand in solidarity with previous commenters.

Thank you.

Response PH264-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter PH265 - Vincent Montago

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH265

Comment PH265-1 MR. MONTAGO: Hello, can you hear me?

MS. SISCO: Yes, we can.

MR. MONTAGO: Hi. My name is Vincent Montago (phonetic). I am the son of Adele Montago (phonetic) and the grandson of Adele and John Denava (phonetic), former residents of the three communities of Palo Verde, La Loma, and Bishop that were violently destroyed by the Dodgers and the City of Los Angeles. I come before you today in full support of the Chinatown residents opposing the gondola.

For far too long, corporations and city entities have taken advantage of poor, brown, and black communities to benefit their own good. And the deal with the taking of our homes, the land was supposed to be taken away for housing, and instead was given to the Dodgers to build their empire that they have today on the backs of the poor people of Los Angeles. This must stop.

This led me into my position of today, which is an elected office, as I stand also from that point of view in opposition of it as Chinatown is being killed. It is not a dying industry.

The plans were put into place 20 years ago for most of our communities to be attacked, and they're being implemented today. And this is a tragedy, that public agencies like Metro would participate in the destructions of our communities when they are supposed to be here to uplift and support local community businesses and residents.

There has never been, in all the years of our families' trauma history, looking at over a 100 years of history with the city and public entities,

Response PH265-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate

existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH265-2 no good has ever come between the deal between the Dodgers and the City of LA.

In fact, we find that these are backdoor corrupt deals that don't benefit the public but benefit people like Frank McCourt, who has owned the parking lot and the stadium at one point in time. And that's their invested interest. So we strongly support the Chinatown residents and all the local --

Response PH265-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030

(Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment Letter PH266 - Melissa Archiga

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH266

Comment PH266-1 MS. ARECHIGA: Hello?

MS. SISCO: Hi. We can hear you.

MS. ARECHIGA: Okay. All right, here we go.

My name is Melissa Arechiga, and I am here today before you as a representative of the surviving families that were violently evicted from Palo Verde, La Loma, and Bishop, three Mexican indigenous communities that were destroyed to build the Dodgers Stadium.

Response PH266-1 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH266-2 I am here today to oppose the gondola project from Union Station to Dodger Stadium. While this may be exciting to film, it is a sign of change and change that is not inclusive to all, specifically people of color.

The Dodgers Corporation and the City of Los Angeles have a long partnership together working to destroy and exploit communities of color. The gondola represents gentrification, the destruction of not only our communities, but the environment and our beloved wildlife.

Response PH266-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Comment PH266-3 The gondola project is no different than the deal that was made to take away our families' generational wealth by destroying the three communities to build Dodgers Stadium.

Response PH266-3 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH266-4 The Dodgers and the Los Angeles City Council set to build the gondola in the middle of our communities, and this would only benefit the Los Angeles Dodgers. Our residents and small business owners will suffer with this so-called revitalization project that is gentrification and a long-term that leaves our most valuable community members displaced with no benefits.

Response PH266-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Also refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH266-5 The history between the Los Angeles Dodgers and the Los Angeles City Council has left our communities in worse condition from the deals of the 1950s, when our homes and the three communities were destroyed. And the lies that were told to the public of building public housing today leave us with the current conditions of our unhoused and affordability crisis that affect us all today.

It is a win-win for the Dodgers, and that has been since Black Friday, May 8, 1959, when our families were dragged out. It's time to put a stop the Dodgers Corporation of exploiting the people of Los Angeles.

I strongly urge that everyone in the public and elected officials oppose this project, as it will damage -- have damaging effects that will last for generations on generations.

Response PH266-5 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH266-2 through PH266-4 for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and would provide benefits to local communities.

Comment Letter PH267- Rafael.pdf

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH267

Comment PH267-1 PARTICIPANT: Can you hear me?

MS. SISCO: Yes, we can.

PARTICIPANT: Hi. I'm Rafael. I'm bred and born Los Angeles and long-time Dodger fan.

Like, I would love to get to Dodger Stadium, like, fast and, you know, not deal with traffic, and it be environmentally friendly, and I've taken the Metro Express. However, I don't think that this gondola is the best way of going about it.

Response PH267-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P267-2 through P267-4.

Comment PH267-2 Number one, you know, besides all the comments that have already been said by people of the community, the one thing for me is this is a pet project and, you know, a way for Frank McCourt to make money off Dodger fans after he, you know, badly, you know, managed the Dodger organization.

Response PH267-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH267-3 Number two, I don't think this is going to be safe at all, and I'm not talking about earthquakes or anything like that. I mean, those who have been to Dodger games, especially if you sit in the, you know, right and left of the pavilion, you know people get drunk. There's been fights after games.

You put them in a gondola, that one fight in a gondola, I mean, how is that going to get broken up, you know, when you're stuck in midair for, what, seven minutes? Or maybe three and a half, if you go from Dodger Stadium to Chinatown and -- or Union Station? That's a long time to wait for security.

Response PH267-3 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed

Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities.

Comment PH267-4 I oppose this, and I think Metro can look into other resources of getting people into Dodger Stadium.

That's all I have.

Response PH267-4 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA.

Comment Letter PH268 - Ray

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH268

Comment PH268-1 PARTICIPANT: Good evening, everyone. My name is Ray, and I'm with Anchor Church of DTLA.

First, I just want to say, go Dodgers. We have the best baseball franchise in LA history, and now that we've settled that, I want to be clear on something else.

A lot of people are under the impression that the churches as a whole aren't concerned with climate change. However, any Bible based church knows that God cares deeply about our climate.

For instance, Revelation, Section 11, verse 18 reads, the nations are very angry and your wrath has come. And the time of the dead, they should be judged, and you should reward your servants, the prophets and the saints and those who fear your name, small and great, and should destroy those who destroy who destroy the earth.

We want to see development at the civic level that endorses positive climate change and zero emission. Public transit shows people at this city not only have the -- not only have great baseball, by the way, and the greatest sports franchise in all of baseball, great people and a great God, but genuine care for this earth. Because after all, this is His earth, too.

Thank you and God bless you.

Response PH268-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter PH269 - Carlos Gomez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH269

Comment PH269-1 MR. GOMEZ: Hello, hi. My name is Carlos Gomez. Thank you for taking my call.

So, I've thought about this long and hard. I am a Dodgers season ticket holder, but, you know, I am a consumer of Chinatown and surrounding areas, and, you know, I've got a chance to talk to locals and some friends about this.

But the reality is, LA's a city of champions. It's, you know, filled with championship in every single major sport. You know, we're going to be the home to the 2026 World Cup, the 2028 Olympics. You know, let that sink in. We're not your typical city.

We're LA. We deserve the absolute best. Most stadiums have some form of train or some form of trams or some, you know, for transportation to the stadium.

Response PH269-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH269-2 We have two buses that leave from Union Station that depart every 15 minutes. Dodger Stadium is iconic, right? It's a rich culture that's bigger than just Chinatown. It represents us as a whole. Right?

We, you know, we owe it to Dodger fans and even visiting guests to provide them with, you know, best possible game experience which, you know, obviously, includes less traffic. This gondola project will set us apart from basically the rest and makes us that much better.

Response PH269-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment PH269-3 On another note, you know, Dodger Stadium is no longer just a baseball stadium. You know, we've had the Fluffy Show, the concert, Elton John.

You know, I am a Chinatown consumer, and the reality is that outside of a few breweries and a few restaurants in the neighborhood, it's sad, but Chinatown's a ghost town. You know, it's filled with small shops that come and go.

I really believe this project would rejuvenate the city, eliminate traffic, and really, you know, keep LA at the very top of the sports industry.

Response PH269-3 Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including potential partnerships with and benefits to local businesses in Chinatown.

Comment PH269-4 You know, like it, love it, it's coming. You know, I support this gondola project 1,000 percent. Go Dodgers.

Response PH269-4 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH270 - Tom Savio

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH270

Comment PH270-1 MR. SAVIO: Okay, can you hear me?

MS. SISCO: Yes, we can.

MR. SAVIO: Okay. I'm Tom Savio, Executive Director of the Los Angeles Union Station Historical Society. This is our opinion.

We oppose billionaire Frank McCourt's racist gondola real estate scheme because it's obviously a Metro sweetheart deal after McCourt paid millions of dollars to Metro's political campaigns, this according to state records.

Response PH270-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH270-2 Metro's Cory Zelmer and company falsified the gondola's Draft Environmental Report by not mentioning that the world's busiest helicopter airport is just a half a mile from the gondola's Union Station terminal, which is –should the 13-story towers and cable be struck by a helicopter, many of Union Station's historical architecture and its trains and passengers could be harmed.

Response PH270-2 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a "public airport" – is based on facts and the specific language of CEQA's thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: "For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project result in a safety hazard…?" The Draft EIR concludes that the proposed Project alignment is not within two miles of a "public use airport" as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed

Project. According to the LAPD and AirNav.com1, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the "public use airport" description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of "airport." Thus, comparison to federal or state case law or regulations relying on a different definition of "airport" is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment PH270-3 Union Station architecture will also be negatively impacted by the gondola's modernistic carnival ride architecture that's in front of Union Station.

Response PH270-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment PH270-4 We believe the real purpose of the gondola is to allow McCourt to build a high-end real estate development on Dodger Stadium's parking lots that he still controls, thus

putting the local, low income minority community out of their homes by raising rents through gentrification.

Response PH270-4 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH270-5 Part and parcel of the gondola project is Metro's plan to use $20 million in federal funds to build a water fountain next to the gondola's Union Station terminal to cool riders while they wait for their gondola rides in the hot season. It's crazy for a new water fountain to be built when LA is experiencing its worst drought in history, which probably will go on for decades.

Response PH270-5 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt. As described in Section 2.0, Project Description, of the Draft EIR, page 2-49, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment PH270-6 Furthermore, McCourt's gondola will trample Los Angeles State Historic Park.

Response PH270-6 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have

less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH271 - Lisa Duardo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH271

Comment PH271-1 MS. DUARDO: Hi. My name is Lisa Duardo, and I'm born in raised in Los Angeles.

I responded to the Draft EIR earlier via letter back on January the 17th, and I would like to add on to the public record these other points that the Draft EIR either dismisses or omitted.

Response PH271-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH271-2.

Comment PH271-2 The Rim of the Valley Corridor Preservation Act was passed by Congress, the 117th Congress. Adam Schiff introduced the bill, and he just spoke about it at P22's Celebration Life at the Greek theater this past weekend.

What the Rim of the Valley Corridor Preservation Act does is it preserves open space for people and for wildlife from the Santa Monica mountains, which include Griffith Park and Elysian Valley Park, to the foothills of the San Gabriel Mountains, which are the Repetto Hills around Highland Park through South Pasadena, Pasadena, connects to the San Gabriel Mountains and the National Angeles Mountains, the Verdugo Mountains, which then connect to the Pacific Rim, which go to Canada and Mexico.

It creates a green wildlife corridor for animals so that they can coexist in our LA environment, and one of the lines on the points of this Congressional Act is that the Rim of the Valley unit would include habitat for iconic wildlife such as the mountain lion, the bobcat, the fox badger, the coyote, and the deer, as well as some endangered species of our area.

The LA Rim --

Response PH271-2 In response to comments regarding the Rim of the Valley Trail Corridor, an addition to the Draft EIR has been provided for the Rim of the Valley Trail Corridor Master Plan. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of the Rim of the Valley Trail Corridor Master Plan. As noted therein, while the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate I-5. The proposed Project would provide access to and connectivity between El Pueblo, Los Angeles State Historic Park, and Elysian Park.

Comment Letter PH272 - Michael Calareza

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH272

Comment PH272-1 MR. CALAREZA: Hello?

MS. SISCO: Hi.

MR. CALAREZA: Hi, yes. My name is Michael Calareza (phonetic). I'm a resident of Lincoln Heights, a stakeholder in this project.

I frequent the state park often. I go to Dodger games, and North Broadway is continually impacted by traffic on Dodger days. However, if Metro wanted to be pedestrian friendly, it would do more.

Metro is not pedestrian friendly. It placates to the political powers or, in this case, the money, pro quid pro -- quid pro quo, I guess, is what's going on from McCourt and his political contributions.

Response PH272-1 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements and drought tolerant landscaping, open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH272-2 So, this is the fast track for him to take advantage of public funds for his commercial interests at the expense of public transportation needs.

Response PH272-2 Refer to Response PH272-1 for discussion of the Project Sponsor and the proposed Project's capital, operation, and maintenance costs and planned sources of funding. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment PH272-3 There should be a sidewalk and stairs that gets people from North Broadway up into Dodger Stadium. Simple, common sense things for pedestrians, like safe sidewalks.

Response PH272-3 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how while there are some game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on the proposed Project, and the path would be on a steep downward grade which does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility.

Comment PH272-4 Transportation should be 21st Century transportation. Gondolas? What's the capacity of a gondola ride? How long is it going to take? How many dozens of people are you expecting to stand in line to take a gondola ride? Drunk after a Dodger game? Before a Dodger game? Come on, where's the common sense? This lacks it.

Response PH272-4 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. Also refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. As discussed in Appendix D of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative

transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

Comment PH272-5 It's political. It stinks of corruption. There should be no public funds for this. Shame on Metro for even putting this in front of people and trying to fast track it.

Response PH272-5 Refer to Response PH272-1 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding. . This comment raises issues that were litigated and decided in The California Endowment v. Los Angeles County Metropolitan Transportation Authority, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process.

Comment Letter PH273 - Brenda Miramontes

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH273

Comment PH273-1 Can anyone hear me?

MS. SISCO: Yes.

MS. MIRAMONTES: Okay, hi.

I am in today to support the gondola project. I am a resident of the community, and I am also a big Dodger fan.

Response PH273-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH273-2 I believe that we're all talking about everything but the pollution. And I believe that that is the most important thing because right now, we have buses and, you know, cars, and all that, and that's just affecting our pollution even more, so why not try anything new?

Response PH273-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH273-3 We are already a city of tourism, so it's not going to affect other -- make any, like, anything worse. I think it's just going to make it better for the Chinatown community. Also, like, we're going to get more tourists, you know, to come in and shop more for them, and it's going to benefit them at the end. So, I'm all in for it.

Thank you. Good night.

Response PH273-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH274 - Maria Manzanilla

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH274

Comment PH274-1 MS. MANZANILLA: Hello? Hello, can you hear me?

MS. SISCO: Hi, yes.

MS. MANZANILLA: Yes? This is Maria Sanchez Manzanilla, and I'm calling just to say that I oppose this gondola very, very strongly.

And I am talking for my community, William Mead, and all the community surrounding the park, LA State Historic Park. And all the communities, William Mead, Chinatown, Solana Canyon, Lincoln Heights, Highland Park, and all of us oppose this horrible gondola. This project is not good for our communities.

Response PH274-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH274-2 And we know that billionaire Frank McCourt is going to get his money back when, after he raise $300,000 -- $300 million and leases that there because he didn't even ask the communities for doing this horrible gondola.

And I think this community, this serves them some kind of, you know -- they just deserve some respect because he didn't ask us for, you know, for anything. He just said he was going to start this project, and we oppose it.

Response PH274-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH274-3 We are opposed to this gondola because it's not good for us. It will destroy our park, LA State Historic Park, and a lot of very bad things will happen to our communities in downtown LA.

Response PH274-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park.

Comment PH274-4 And all this is only lies because what happens if one of these gondolas falls on top of the head of people who is running in the park?

Response PH274-4 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Comment Letter PH275 - Jennifer Martinez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH275

Comment PH275-1 MS. MARTINEZ: Hi. Can you hear me?

MS. SISCO: Yes.

MS. MARTINEZ: Okay. Thank you for giving me a second chance because I was left off last time. My name is Jennifer Martinez. I'm a resident of Echo Park,and I oppose the gondola project.

Response PH275-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH275-2 And I am grateful for this session because I have learned a lot, and I also work providing sessions like this, so I appreciate the effort. But I have some common sense concerns about the project, and what strikes me from this discussion is, and what has bothered me about the project is the process. This is a missed opportunity for a wealthy member of Los Angeles to come into a community and create opportunities, perhaps, for that community.

So, my biggest problem is that the public sessions, which I know are part of the process, have not been made easily accessible to all in the community.

Response PH275-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar, to accommodate agencies, interested parties, and organizations who were unable to attend the meetings held in person. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Comment PH275-3 And we're hearing this evening about concerns about businesses in Chinatown. So, how many restaurants and halls and public spaces are there where LA Art and Frank McCourt could have held sessions to create actual -- to just good faith, you know, action? And I mean, not like –I mean, two things about that.

One is, I don't understand why Frank McCourt and LA Art are not courting the business owners and the residents of Chinatown. They have the capacity. They have --

Response PH275-3 Refer to Response PH275- 2 for discussion of the proposed Project's public outreach during each stage of the environmental review process. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH276 - Mary

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH276

Comment PH276-1 PARTICIPANT: Hello.

MS. SISCO: Hi. We can hear you.

PARTICIPANT: My name is Mary, and I'm a senior, and I want to make a comment about the last meeting that Metro had.

I believe Metro should have had taken better control of the meeting since the protesters had all the control with the disruption, the profanity, making people feel threatened, scared of the situation happening in front of them.

We should all feel safe no matter where we are, as well as be able to speak and share our support for the gondola.

Thank you so much.

Response PH276-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12 public hearing. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment Letter PH277 - Marlo Cervantes

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH277

Comment PH277-1 MR. M. CERVANTES: Hello?

MS. SISCO: Hi, we can hear you.

MR. M. CERVANTES: Yes. My name is Marlow Cervantes (phonetic), and I am a LA citizen born and raised, and I support the Dodger Stadium gondola.

My neighborhood deserves less traffic, less pollution for clean air with more transportation options. I hope that this is a better and for our future for us and our nation to come. Thank you.

Response PH277-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH278 - Ali Rubinfeld

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH278

Comment PH278-1 MS. RUBINFELD: Hi. My name is Ali Rubinfeld. I'm a resident of Solana Canyon. I don't think there are people in Los Angeles who want to alleviate traffic to Dodger Stadium more than the residents of Solana Canyon, but this is just not the way.

This is a transparent power grab with the long-term goal of creating a high end development and shopping center at Dodger Stadium that does not meet the needs of a community currently living in the area.

Response PH278-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH278-2 There are so many ways to make Dodger Stadium more accessible that will not cause more harm to communities still healing from the violent taking of Chavez Ravine.

Response PH278-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to

have the most travel time competitive transit trips from more locations in the region. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment PH278-3 This gondola will completely change the socioeconomic landscape of Chinatown, which is one of the last affordable neighborhoods left in Los Angeles, and people have been fighting to keep their homes there.

This gondola will make Los Angeles a less affordable and less livable city and is completely ignoring the true needs of the community. It's here for a profit motive.

We need a grocery store. We don't need a gondola. Thank you.

Response PH278-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing and how the proposed Project will not result in displacement of residents in the surrounding neighborhoods. Refer to Topical Response N, Environmental Justice, for a discussion of how the Draft EIR addresses environmental justice and how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment Letter PH279 - Erik Van Breene

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH279

Comment PH279-1 Good evening, Erik Van Breene from the Los Angeles Conservancy. The Conservancy submitted written comments prior to the January 17 deadline.

We have real concerns about the project in its current form and its impacts to Chinatown, Union Station, El Pueblo, and Los Angeles State Historic Park.

Response PH279-1 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Chinatown, LAUS, El Pueblo, and the Los Angeles State Historic Park. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH279-2 Additionally, we have concerns about the proposed transfer of public lands to private hands.

Response PH279-2 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH279-3 We don't believe the draft EIR fully demonstrates the purpose and need when an environmentally superior alternative has been identified that would expand the already existing Dodger express bus line.

Response PH279-3 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems

Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH279-4 With the project's encroachment into Union Station's parking lots, it's foreseeable that this project will tap federal funding and therefore require additional environmental reviews that typically coincide with the CEQA process, which is not happening here.

Thank you for hearing my comments and we encourage you to take these concerns seriously.

Response PH279-4 Refer to Section 2.0, Project Description, for discussion of the proposed Project's Alameda Station. Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR, for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. Construction and operational impacts associated with the proposed Project would be less than significant. As proposed, the proposed Project does not require Federal review.

Comment Letter PH280 – Katherine Christman

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH280

Comment PH280-1 Hello, can you hear me? Yes.

Hi, I'm Katherine Christman from West Los Angeles. I'm a 31-year-old entrepreneur from our city with Parkway [inaudible]. I'm also a proud board member on the National Association of Woman Business Owners [inaudible], currently serving in the VP role. I am in full support of this project for a variety of reasons, but to keep it short, the most pressing and urgent to me is the air quality for the beautiful community surrounding the stadium.

[inaudible] deserves a better scenario than they're currently enduring. I also love the opportunity for Dodger Stadium to become more accessible and available from other Southern California [inaudible] from Union Station. And so I think it's a beautiful project. I'm very proud of the [inaudible] and I'm in full support of it, as is our Association of Women Business Owners.

We are so excited about it. A lot of value in it. Thank you so much.

Response PH280-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate

neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The design for the proposed Project's stations and junction studied in the Draft EIR would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming.

Comment Letter PH281 – Chris Wilson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH281

Comment PH281-1 Good evening. My name is Chris Wilson with the Los Angeles County Business Federation. This is in full support of this project as proposed. LA ART will provide the first public transit connection to Dodger Stadium, which has the highest attendance out of any stadium in the country and is one of the few without a dedicated transit connection. It will improve traffic and parking for residents by potentially removing up to 3,000 car trips from neighborhood streets, easing local traffic, improving safety and reducing the need to park in the local community.

The LA ART system will be emissions free, emissions free and will provide the opportunity to connect communities who have been dis-appropriately impacted by traffic and pollution. This would significantly improve traffic conditions and air quality in the neighborhood for these reasons, and more [inaudible] supports the zero-emission gondola from Union Station to Dodger Stadium. Thank you so much.

Response PH281-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH282 – Mary

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH282

Comment PH282-1 Hello, my name is [Mary] and I live in Solano Canyon.

I support the gondola since it would eliminate the traffic as well as the cars that park and block our driveway. That would be greatly appreciated that this project passes and it will make everyone happy in Solano Canyon. Thank you so much.

Response PH282-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH283 – Kathleen Johnson

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH283

Comment PH283-1 Hi, can you hear me? My name's Kathleen Johnson. I'm executive director of L.A. River State Park Partners, the support organization for our state historic park and the two other parts of the park. The gondola will not only adversely affect nearby neighborhoods, it will severely and permanently compromise people's experience of LA State Historic Park, a publicly funded green space that residents fought for decades, literally, to establish, and a site with deep historic significance to L.A. as the former home of the [inaudible] Station. LA ART seeks to take what we feel is a significant portion of land to the station with towers and gondola lines running over the southwestern section just 20 feet above people's heads.

Response PH283-1 Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park. Refer to Responses PH238-2 and PH238-3 regarding the footprint of the proposed Project in the Los Angeles State Historic Park.

Comment PH283-2 This aerial road to the park will disrupt as much as an actual road would with at least 10% of the park under the constant traffic of gondola cars,

Response PH283-2 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging,

walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Additionally, refer to Topical Response M, Comparable Urban Aerial Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH283-3 the thoughtfully designed sense of tranquility and open space will be degraded and the park's open skies and magnificent views of the downtown skyline, [Legion] Park and Broadway Viaduct forever altered.

Response PH283-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. As discussed in Section 3.01, the Chinatown/State Park Station location in the southernmost portion of the park would not block any designated scenic vistas, alter scenic resources, or block panoramic views, including views of Elysian Park and the Broadway Bridge to the north. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park, and

its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Comment PH283-4 These park impacts have been severely downplayed or glossed over in the draft EIR, so we request any use of this hard-fought public park, land airways [inaudible] for private enterprise.

Response PH283-4 Refer to Response PH238-2 and PH238-3 regarding the Draft EIR's discussion of the proposed Project's impacts to the Los Angeles State Historic Park. Refer to Comment S2 and the responses therein regarding the Los Angeles State Historic Park. The fundamental goals of environmental review under CEQA are to provide information and allow for a meaningful opportunity for the public to participate in the environmental review process. The Draft EIR provided sufficient information in order for the public and decisionmakers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment PH283-5 And despite the traffic study, there are 3,000 cars that the planners hope will be eliminated at Dodger Stadium we have little faith about. We feel that they would just be re-routed to the park and surrounding neighborhoods, just further compromising park users' access and experience of this treasured urban greenspace. Thank you very much.

Response PH283-5 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment Letter PH284 – Bill Chen

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH284

Comment PH284-1 Can you hear me?

Thank you. I am not at my computer. I want to say that the park should have its own autonomy and that there should be no compromise from the original park design tree cutting and/or taking of any of the land.

Response PH284-1 As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, the proposed Project's Chinatown/State Park Station would be consistent with the goals and

guidelines of the Los Angeles State Historic Park General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect. However, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the Park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to a less than significant level. Refer to Topical Response F, Los Angeles State Historic Park, for additional discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment PH284-2 That said is one thing, but traffic with MTA and I understand events for athleticism, it's just discretionary money that is more important for MTA to look at transportation when people are actually working in downtown [inaudible] into the downtown.

I'm talking about the intersection of Sunset and [inaudible], where the central city West specific plan says there should be widening of [inaudible] onto Sunset. And I'm talking about the 101 freeway that needs to have more lanes. If it has more lanes, it would help with commuter traffic going in and out of downtown.

Response PH284-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance

costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH284-3 And it would also help with moving transportation into Dodger Stadium by way of traffic south of Sunset on [inaudible] going in and out on Sunset Boulevard by way of [inaudible] and to [inaudible] Way up to the mesa.

Response PH284-3 Refer to Response PH284-2 for discussion of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment PH284-4 And I also wonder why people don't talk about having free shuttle from the Chinatown Go station to go up to the [inaudible] because there is busses from Union Station. Why not from Chinatown as well? Thank you.

Response PH284-4 Refer to Topical Response C, Project Features, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus

only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express.

Comment Letter PH285 – Elias Garcia

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH285

Comment PH285-1 Good evening. My name's Elias Garcia. On behalf of the Los Angeles Area Chamber of Commerce, we'd like to offer our strong support for this project and join others on this call that have supported us, have stated their support. The Rapid Transit Project is a transformative project that offers the capacity to move approximately 5,000 people per hour per direction, using a quiet, safe, environment-friendly and a proven zero-emission technology.

It will connect such communities as [inaudible] Union Station, Chinatown, Mission Junction to Newark, Solano Canyon, while also providing access to the L.A. State Historic Park, the LA River and [inaudible] Park. Of course, this connectivity is great, but it also means this project also means better health outcomes for these communities as a result of lower pollution and fewer congestion.

So we urge to move this project forward. Thank you.

Response PH285-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH286 – Phyllis Ling

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH286

Comment PH286-1 MS. LING: Hello

MS. SISCO: Hi, Phyllis. We can hear you.

MS. LING.: Okay, hi, my name is Phyllis Ling. I'm a resident by the Broadway Junction. I'm completely opposed to this project. It makes no sense. Logistically, it shifts parking and traffic further into Chinatown and this project would dangle less than 40 feet above my property, which invades my air rights

Response PH286-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New

York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH286-2 The noise study is vague and needs some more details. Gondola stations and junctions are noisy and you're talking about running this 18 hours per day and then doing maintenance and testing during the other 6 hours. You don't even name the gondola system that was used to take measurements to estimate the noise that the stations would cause.

Response PH286-2 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. To provide a conservative operational noise analysis, the worst-case scenario was selected which represents a Dodger Game Day, with the highest line speed, cabins per hour, and queuing numbers, and with nighttime operations. Tables 3.13-22, 3.13-23, and 3.13-24 on pages 3.13-53 to 3.13-57 of Section 3.13, Noise, of the Draft EIR demonstrate that operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, FTA, and LAMC. In addition to the primary operational noise levels evaluated in the Draft EIR, the noise generated inside cabins was also evaluated separately, as demonstrated on Table 3.13-25 on page 3.13-57 of the Draft EIR. The cabin noise would not result in a contribution to cumulative noise levels because NOI-PDF-A ensures that the cabins would be designed such that they would generate noise levels of at least 10 dBA below the current background levels. Table 3.13-26 summarizes operational noise impacts for the worst-case operational scenario which includes potential impacts from cabin noise as the gondolas travel between and within the stations, towers, and junction. Operational noise impacts would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine.

Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how maintenance would include observation of the overall system as part of the startup routine for system safety. Maintenance for the proposed Project would include maintenance of cabins, daily inspections, minor repairs, and major repairs. The proposed Project cabins would be primarily serviced overnight at the subterranean cabin maintenance

area below the Dodger Stadium Station. Maintenance activities in the Broadway Junction are expected to be limited primarily to maintenance of the Broadway Junction itself and would include daily inspections, minor repairs, and major repairs. Daily inspections would be conducted by the system operator and would not be associated with any noise generating equipment. Periodically, minor repairs may be needed based on these daily inspections. Work associated with minor repairs would be limited. Any major repairs to or replacement of large capital equipment at the Broadway Junction would be performed during planned outages and would occur on an infrequent basis. For instance, the drive motor is estimated to have a ten-year or greater life cycle and would be replaced as part of a planned outage.

Refer to Topical Response P, Gondola System Noise Modeling, of the Final EIR, for discussion of the noise model used to predict noise levels from operations of the proposed Project and how use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated and has been shown to result in a conservative assessment of the noise generated by the proposed Project. The reference noise levels in Appendix L, 3S Sound Measurements Memo, of the Final EIR, were taken in Tyrol, Austria at the Stubai Glacier.

Comment PH286-3 There's no discussion of the differences between these systems the drive [inaudible] pulling the gondolas all the way from Union Station is in a junction across the street from my house. So that's going to have a huge impact.

Response PH286-3 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. Operational noise impacts would be less than significant, including from Broadway Junction. Refer to Response PH286-2 for discussion of the noise model used to predict noise levels from the operation of the proposed Project and how the reference noise levels in Appendix L, 3S Sound Measurements Memo, of the Final EIR, were taken in Tyrol, Austria at the Stubai Glacier. The Evaluation of operational noise impacts in the Draft EIR appropriately relied on the Rossi Article because a 3S gondola system similar to the proposed Project, which includes the system components of the Broadway Junction, was utilized in the assessment of noise impacts to validate the Rossi Article equations. Based on the similarities between the 3S gondola system for the proposed Project, and the 3S gondola system in Tyrol, including the same speed as the proposed Project, a similar cabin capacity, and similar system mechanics. Using the Tyrol system to validate the Rossi Article equations is appropriate and no adjustment to the noise predictions is needed to use the Tyrol system to validate the Rossi Article. Like the Broadway Junction, the system in Tyrol includes both a drive bullwheel and a return bullwheel. Accordingly, the assumptions in the Draft EIR conservatively reflect noise associated with both a drive bullwheel and a return bullwheel at all station and junction locations.

Comment PH286-4 There's also hardly any disclosure about how this project would be operated and implemented, which would impact ridership and greenhouse gas emissions

Response PH286-4 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH286-5 Security management of cues and crowd control are hardly discussed at maximum capacity. People could have to wait in line for 1 to 2 hours, and you're relying on a magical ticket reservation system to even out the crowds. You need to explain how that works.

Response PH286-5 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR for discussion of how the proposed Project is equipped with security features. For example, to provide added security to system passengers, each gondola cabin would have a security camera on board with a feed to the control room, as well as a "push to talk" button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies such as a medical emergency in a cabin or in a station or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local authorities for further instruction and coordination. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station and due to the nature of queue formation, the pre-game/event passenger

queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations. Approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station, and queues would therefore be accommodated within the Station, given this lesser boarding demand and the larger queuing capacity at the Station. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

The purpose of the timed ticket reservation system would be to reduce queue lengths and waiting times for riders waiting to board the proposed Project at the Alameda Station or the Chinatown/State Park Station before a large game or event at Dodger Stadium by managing arrival times. Potential elements of such a system could include: the timed arrival reservations would be free; the reservation system would be online; for those without online access, kiosks could be provided at LAUS, the Chinatown/State Park Station, and/or at Dodger Stadium; reservations would be issued for 30-minute arrival periods and the user would pick a time and the boarding station; the timed ticket reservations would be transferable similar to how game and event tickets themselves are transferable; the timed tickets would be checked by proposed Project attendants at the entrance to the line; those who arrive earlier than their arrival window would be fed into the boarding line when possible in advance of their arrival window or wait until their arrival window; those who arrive later than their arrival window would be held and fed into the boarding line when possible; incentives could potentially be offered to encourage choice of earlier windows; and there would be no exclusive access to preferred arrival windows to particular groups of people. The timed ticket reservation system would likely not be used post-game. The system will be more fully developed prior to proposed Project operations.

Comment PH286-6 I don’t even have time to get into the flight from advertisements constantly streaming over our neighborhoods.

Response PH286-6 Refer to Topical Response K, Signage and Lighting, for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators. Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes KOPs updated in part to incorporate the proposed Project's signage program, as depicted in the signage package included in the Lighting Study. There is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the proposed Project system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment PH286-7 There's also cutting down 50-foot trees and oak trees in the park.

Response PH286-7 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment PH286-8 And this faulty parking study that includes a lot of parking that isn't even open until, such as parking at the state park, which closes at sunset. So how are people going to get their cars out of the state park parking lot?

Response PH286-8 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Anyone parking in a parking lot is subject to the operating hours established by the operator of the parking lot.

Comment PH286-9 And then also, I want to say that the pedestrian bridge into the park from Broadway, it shouldn't be held hostage to this project.

Response PH286-9 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the State Park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the Park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

Comment PH286-10 And then I think an option to get to Dodger Stadium is all fine and good, but not when it sucks away resources from all other options that we're not even discussing. This would be a tourist trap. There should be additional studies. The Dodger Stadium Express from other locations, such as Pasadena.

Response PH286-10 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but

there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to

Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment Letter PH287 - Tabitha

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH287

Comment PH287-1 Hi, my name is Tabitha, I'm an organizer with Power Out Way. We do organizing in this area, especially around Chinatown. I have a few issues with the draft EIR and I'm completely opposed to the project.

Response PH287-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses PH287-2 through PH287-9.

Comment PH287-2 The first one being that the EIR studies are routinely conducted by outside entities that are selected by the developers of the project. [inaudible] disclosure, public input in deciding who's going to conduct the EIR.

Response PH287-2 Refer to Section 8.0, List of Preparers, of the Draft EIR for list of preparers for the Draft EIR. AECOM was selected from Metro's roster of environmental consultants.

Comment PH287-3 So it's very convenient for them, that they found everything to be less than significant.

Response PH287-3 Consistent with the requirements of CEQA, Metro has and will independently review, evaluate, and exercise its judgment over the proposed Project's environmental review and EIR. The Draft EIR that was circulated reflects Metro's independent judgment. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Additionally, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR.[1] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment PH287-4 Second is it's unclear to me that this project will reduce vehicle miles traveled. It seems like we'll just displace those vehicle miles traveled to Union Station and

[1] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Chinatown Station. Chinatown is the neighborhood with the lowest [inaudible] after Skid Row. And this community cannot become a giant parking lot.

Response PH287-4 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH287-5 Citizens need actual services. During the land use and planning analysis, they talk about how this will remove first the last mile transit. I don't see how that's possible. People are still going to have to drive to the gondola in order to take it. So that is, I don't see how that makes any sense.

Response PH287-5 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors

drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment PH287-6 I'm also opposed to giving any sort of exceptions to the general plan for the park to cut down the trees.

Response PH287-6 The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent

authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment PH287-7 As several members of the communities have voiced, I don't know if you know, but Chinatown has an increasing aging community and the construction impacts, I don't know if they were calculated for average people of like average age or if they're calculated, considering that this elderly community has special needs. The elderly population is more sensitive to air pollutants and noise pollutants.

Response PH287-7 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular. Refer to Section 3.03, Air Quality, of the Draft EIR, for a discussion of how the proposed Project's potential to expose sensitive receptors to Toxic Air Contaminants during construction was evaluated through a Health Risk Assessment (HRA), included as Appendix D, Air Quality/Health Risk Assessment Technical Report, in the Draft EIR. As discussed in the Draft EIR, the HRA was conducted in accordance with South Coast Air Quality Management District (SCAQMD) risk assessment guidelines, which are based on the Air Toxics Hot Spots Program Risk Assessment Guidelines developed by the California Office of Environmental Health Hazard Assessment (OEHHA) and updated in 2015. The 2015 OEHHA guidelines are based on years of scientific studies evaluating health risks and include a number of conservative assumptions to be protective of human health and to estimate potentially higher risks and sensitivity factors for infants, children, and other sensitive receptors, including the elderly. The results from the construction HRA in Table 3.3-7 show that the maximum incremental cancer risk and chronic non-cancer impacts would be below SCAQMD significance thresholds for all modeled receptors, which include the sensitive receptors located near proposed construction areas. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment PH287-8 Will the gondolas affect property values? A lot of planners like to say that displacement will not happen because you're not removing any houses, you're not building on an existing housing site. But if it's going to hike property values and that's going to cause gentrification to come into the neighborhood, again, this is the poorest

house neighborhood in the city, but you're not going to add or alter any existing facilities.

Response PH287-8 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Section 3.15, Public Services, of the Draft EIR, for discussion of how the proposed Project would have less than significant operational impacts, including to public facilities.

Comment PH287-9 This is a community that needs more investment in services. So the fact that you're making it harder to add more is a problem for wildfire. Existing wildfire routes are already inadequate a lot of times.

Response PH287-9 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project, and accordingly the proposed Project would not detract from potential investment in neighborhood services. Refer to Section 3.20, Wildfire, of the Draft EIR for discussion of the proposed Project's potential impacts to wildfire, which would be less than significant, including with respect to the implementation of emergency evacuation plans. Refer to Section 3.15, Public Services, for a discussion of how impacts related to fire protection services during proposed Project operation would be less than significant.

Comment Letter PH288 – Speaker 18

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH288

Comment PH288-1 My name is [inaudible]. My family owns and operates the [inaudible] in Olvera Street, and we are in full support of the project. Not only would it help reduce traffic, good for the environment and provide much needed infrastructure and resources to an underserved part of downtown L.A., but as we enter a global recession, the L.A. region would benefit greatly from this world class project, a proven, innovative mode of transportation, and would attract much needed visitors from around the region and the globe.

It can also be a catalyst for future innovative transport solutions. This is a huge opportunity for L.A. and I hope it is approved. Thank you.

Response PH288-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH289 – Speaker 19

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH289

Comment PH289-1 Hello, my name is [inaudible], Manager of Advocacy and Public Policy for [inaudible], Southern California. We're an environmental health non-profit that focuses on clean air and healthy lungs. We would like to convey our support for the L.A. Aerial Rapid Transit Project. The project provides a zero-emission form of transportation that would decrease greenhouse gas emissions, cut smog and reduce the number of cars on the road, all of which provide significant public health and environmental benefits.

Thank you.

Response PH289-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH290 – Ernest Li

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH290

Comment PH290-1 Thank you. My name is Ernest Li from the [inaudible] Chinese Consolidated Benevolent Association. I'm speaking in full support of the gondola project. It is a good project that is almost zero emission. This green project is good for the environment. And also it's at the iconic structure through the Chinatown area, and this is good for Chinatown, and also it provides an opportunity to link up the key cultural institution like Olvera Street, the Chinese [inaudible] Museum, and it links to Chinatown and allow a lot of the traffic and the opportunity for the local merchants to promote visitors, to eat and shop locally.

So it's good for the local economy. So I'm speaking in full support of this project. Thank you.

Response PH290-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter PH291 – Speaker 21

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH291

Comment PH291-1 Hello? Hello? Can you hear me?

Okay. What's [inaudible] this project cause the people that we live here, we get stuck when there's anything. And if we come back from work and we forget something from our groceries we have to go away to [inaudible] come back into our own houses. This will help a lot, you know, [inaudible] we move around the city.

Also, zero emissions. I am here to support the [inaudible]. Thank you very much.

Response PH291-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH292 – Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH292

Comment PH292-1 Hi, I organize with Power L.A. and Chinatown Community for Equitable Development, providing tenant support to low-income Cantonese seniors and I absolutely oppose this project. Seniors with limited ability, with limited mobility have no need for a train in the sky that only goes to Dodger Stadium. Their needs are on staying housed, securing affordable housing and a halt to the rising cost of living, which this gondola as a tourist attraction would only contribute to.

Response PH292-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of housing in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby residential uses.

Comment PH292-2 If you look at just College Station alone, where one of these gondolas support towers is slated to be built, that area's already been flipped into this upscale expensive area to dire effects, pricing out long-time low-income residents. This gondola is just more of the same. And before you think that affordability of the neighborhood is not an issue with this project, which I know you're thinking because one of the L.A. ART Cantonese-speaking interpreters tried to tell me so after reading a resident's written comment at the Union Station hearing on Saturday, You're wrong!

Response PH292-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH292-3 This gondola is being built public land where that land should be used for public good. To serve the most good, you must protect and be in alignment with the most poor. You want to fly over red lanterns and go to rooftops. You want to flash Chinese culture without paying a lick for the Chinese immigrants who built it and risk being displaced from it.

This gondola is not a community serving project. It is a private billionaire serving project. Chinatown is the second poorest neighborhood in L.A. It doesn't even have a full-service grocery store. It does everything that you would spend time and money catering to a seasonal entertainment issue and not honoring the truly urgent life-threatening issues of displacement that our most vulnerable residents face.

So every time I saw this project for the good of people, do not build this gondola. Thanks, maybe.

Response PH292-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response E, The Proposed Project Will Not Displace Housing

or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment Letter PH293 – King

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH293

Comment PH293-1 Hi, my name is King [inaudible], a member of the Chinatown Community for Equitable Development, which is located in Chinatown. I strongly oppose the gondola project. It is nothing but a rip off of the taxpayers using public space, public money and is only for the good of one guy who want to build a kind of LA life, kind of a project up on the parking lot and near the Dodger Stadium.

Response PH293-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Comment PH293-2 And I think that is not going to be good for the Chinatown community, for small businesses. Why would anybody stick around Chinatown when they can just get up there, eat and drink and attend games? So I think that the line that is good for Chinatown business is not are not going to [inaudible], in fact it make things worse, make things a lot worse.

If there's a station near LA State Historic Park, who want to walk up there to Chinatown, maybe for [inaudible] and the [inaudible] area. But who are going to [inaudible] and Alpine area to eat and shop, which is a [inaudible]. Nobody would do that. Convenience is they're going to just take the gondola and go and shop up there.

Response PH293-2 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH293-3 So it is going to be worse for Chinatown, but that is going to be cause more gentrification, making housing a more expensive and less affordable for the low-income residents in Chinatown. [inaudible] oppose the project.

Response PH293-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment Letter PH294 – Luke MacDonald

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH294

Comment PH294-1 Hello? Can you hear me? My name is Luke MacDonald. I live nearby Union Station and I wanted to comment that I think this is a really bad idea. I don't really trust the arguments for lower pollution and I think that the money would be much better invested in in public transportation. The [inaudible] application, not just going to Dodger Stadium, baseball games.

Response PH294-1 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH294-2 I'm definitely also concerned with the gentrifying of the communities and also like the thing that like that's going to improve parking I think is also very [inaudible]. It seems like it's just going to move [inaudible] thing making Chinatown a big parking lot. It doesn't seem like great idea. So it's just kind of like a really strange and kind of a waste of money.

So yeah, yeah, I think [inaudible].

Response PH294-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter PH295 – Michael

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH295

Comment PH295-1 Hi, good evening. Michael [inaudible] with Central City Association. We support the proposed L.A. ART zero emission project and appreciate the community engagement that the project team has conducted in downtown and in surrounding areas. In addition to making progress on our state's climate goals, the proposed gondola would reduce emissions, and some of the L.A. community is very most impacted by air pollution.

I think LA ART is expected to take 3,000 cars off the road before and after Dodger Stadium events. It will reduce vehicle congestion, which frees up stadium visitors and the surrounding communities' time and improves accessibility to surrounding residences and local businesses in the project area. Thank you.

Response PH295-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical

Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH296 – Douglas Carstens

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH296

Comment PH296-1 Hello. Good evening. This is Douglas Carstens on behalf of the California Endowment. We oppose the gondola project. Metro should not be pursuing this private project at Frank McCourt's behest at all. Metro should not be the lead agency because the City of Los Angeles is in a much better position and there's more property designated as the lead agency.

Response PH296-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment PH296-2 First, regarding the EIR SEQA, the California Environmental Quality Act is a Bill of Rights for an environmental democracy. An EIR is the heart of SEQA, an EIR is not supposed to be a sales brochure or an infomercial for a project.

It's supposed to be an unbiased, full disclosure document that advises the public and decision-makers of the impacts of the project and how those impacts can be reduced. This draft EIR presented by ART and Metro falls woefully short of those legal requirements for full disclosure and accuracy, and instead it's biased in favor of the project.

Response PH296-2 The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment PH296-3 I wish I could repeat verbatim everything that Kathleen Johnson, [inaudible], Tabitha, Phyllis Ling, Bill Chen, Luke McDonald said.

Because a lot of that I'd like to say, but I only have this 2 minutes, so I will say the analysis in the gondola, instead of being meaningful and accurate, is distorted and misleading.

Response PH296-3 The Draft EIR complied with CEQA's requirements, providing the necessary analysis in the Draft EIR's main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. Refer to Response PH296-2 for discussion of how the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment PH296-4 The entire financial plan, which the Metro Board was promised would be made available before the end of September 2022, is missing altogether. The missing financial information is critical to understanding how impacts identified in the EIR would be mitigated by the project proponent and how they will not be.

The project proponent, Frank McCourt, has only committed to funding 3% of the entire project budget, so the shortfalls in construction and operating revenues will be need to be made up somewhere, most likely from public transit funding sources. Better use for public projects.

Response PH296-4 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CEQA does not require the proposed Project to provide a full accounting of how each mitigation measure will be funded.

Comment PH296-5 We ask that you terminate the project review process immediately if you don't terminate it immediately, Metro should transfer the lead agency status to the city of L.A. to complete the review and process it.

Thank you for your time.

Response PH296-5 Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with

the Applicable Responsible Agencies, for discussion of why Metro is the proper lead agency for the proposed Project and the City's participation in the environmental review process as a CEQA responsible agency.

Comment Letter PH297 – Speaker 27

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH297

Comment PH297-1 From the very start of this project, I knew I wanted to keep an eye on it because it impacts both my communities of Chinatown and my community of Pueblos or [inaudible]. My name is [inaudible], I grew up in Chinatown, and I am currently, after retiring from Cal State L.A. as a professor of [inaudible] education, I am now associated with the Chinese American Museum.

Response PH297-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH297-2 So from the very beginning I was keeping my eye on this project, and what I found very worthy of supporting is the fact that I agree that this project would benefit both Chinatown and El Pueblo. Very often when I had questions or wanted to push back on some of the plans, I was able to communicate with L.A. ART and they listened and they tried to incorporate as much of our community's suggestions as possible.

Response PH297-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment PH297-3 For the EIR tonight. I just want to comment that as an academic, I understand what significant means and what less than significant means. And so while on one hand, I like the reporting that it lessened significant with mitigation, but even then I like to connect that with community input to look at what that, what those mitigations might be so that we can have a more well-rounded view on how we can resolve some of the problems that not everybody would agree with. Thank you

Response PH297-3 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of mitigation measures and project design features is consistent with the requirements of CEQA. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter PH298 – Jim Starr

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH298

Comment PH298-1 Hello, this is Jim Starr. I'm against Frank McCourt [inaudible] because it's Alameda Street Terminal, which is designed like a Disneyland attraction, will harm the view of Los Angeles Union Station's Hispanic architecture. And one of the reasons it is a national historic landmark. Thank you.

Response PH298-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment Letter PH299 – Melissa

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH299

Comment PH299-1 Hello.

Hi, good afternoon.

I'm calling today because I support the gondola project.

One of the reasons is because I feel like, there will be actually more visitors to Chinatown than people just jumping into their cars after the game and going back home.

They'll pass by Chinatown. And, you know, be curious and come back and visit. Also because of the pollution and less traffic. Thank you for your time.

Response PH299-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH300 – Michael Chong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH300

Comment PH300-1 Hi. This is Michael [Chong], and I'm calling in favor of the L.A. ART project. I'm currently a Chinatown resident, and, you know, Metro has, in the past couple of decades, has made us understand that Los Angeles can have a strong network of public transportation along the side of cars and other variables. The [inaudible] is a good example of that.

But unfortunately, it doesn't [run] on non-Dodger events. We have a lot more activities in Dodger Stadium lately, which is a good thing, but also causes a lot of concerns in regards to traffic and congestion, air traffic congestion and pollution. I believe that the gondola project is the next step in our future. It would be a marker and an important infrastructure that people can visually see that Los Angeles can be centered around alternative modes of transportation, finding creative solutions for people to get out of their vehicles and hopefully as a result, supporting the surrounding businesses instead of driving past them.

Thank you.

Response PH300-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.0, Project Description, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Comment Letter PH301 – Edwin Lee

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH301

Comment PH301-1 Hi, my name's Edwin Lee and I'm a resident at the Bishop and Broadway Junction and I'm against the project.

Response PH301-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH301-2 I don't, I think the visual impact assessment is biased and dismissive. These are massive concrete structures and five-ton gondola cabinets flying over our streets and parks. Of course, this will have a negative visual impact. If this was a more rich, more wealthier neighborhood, this would not be allowed.

Response PH301-2 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion

regarding the ability of uses to continue at the park. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. The Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH301-3 And the noise from the gondola station in our neighborhood is not adequately studied. The noise analysis is vague and does not even disclose the gondola system used to take reference measurements. We are the difference. What the difference and similarities in these gondola systems?

Response PH301-3 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Topical Response P, Gondola System Noise Modeling, of the Final EIR, for discussion of the noise model used to predict noise levels from operations of the proposed Project and how use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated and has been shown to result in a conservative assessment of the noise generated by the proposed Project. The evaluation of operational noise impacts in the Draft EIR appropriately relied on the Rossi Article because a 3S gondola system similar to the proposed Project, which includes the system components of the Broadway Junction, was utilized in the assessment of noise impacts to validate the Rossi Article equations. Based on the similarities between the 3S gondola system for the proposed Project, and the 3S gondola system studied in the Rossi Article (in Tyrol,

Austria), including the same speed as the proposed Project, a similar cabin capacity, and similar system mechanics. Using the Tyrol system to validate the Rossi Article equations is appropriate and no adjustment to the noise predictions is needed to use the Tyrol system to validate the Rossi Article.

Comment PH301-4 And furthermore, there's still no funding plan for this project. Thank you.

Response PH301-4 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter PH302 – Alan Weeks

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH302

Comment PH302-1 Okay. Okay. Thank you. My name is Alan Weeks and I'm very interested in the project. I think it's interesting, it's unique and it will make a great tourist attraction.

Response PH302-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH302-2 But I do have one objection, and I think it's a major one. I've lived here, I'm 90 years old. I've lived here all my life. And I remember my mother took me to the Union Station opening in 1939. And as you know, when you come in from the Plaza, you get a tremendously beautiful view of really historical monuments. And if you build that station and it appears to be quite significantly large, and will definitely block the view from people coming in on the west side of the station, it's going to block their views. So for that reason alone, if you find another location for the station, otherwise I don't have any objection to the project.

Thank you.

Response PH302-2 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. Construction and operational impacts associated with the proposed Project would be less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including at Los Angeles Union Station (LAUS).

Comment Letter PH303 – Darryl Saucedo

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH303

Comment PH303-1 Did it work?

Did it work? Okay. Well, good afternoon. My name is Darryl Saucedo. I'm the chairman of the board of the Los Angeles Latino Chamber of Commerce, and we support this project as well.

Response PH303-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH303-2 But I would like to go on record that the LA [LCC] has strongly recommended that if this project moves forward, that the project hires at least 35% small, local, small, diverse businesses, not only in construction but to provide maintenance and staffing through our local AGC participants.

And I think that they should be given a preference for anybody that uses our local workforce. Thank you.

Response PH303-2 Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter PH304 – Speaker 35

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH304

Comment PH304-1 So my name is [inaudible]. I'm a local resident of the Chinatown community. I'm here in support of the gondola project because I believe it brings a lot of benefits to our neighborhood and community. First, it improves the traffic, improves the air quality, also brings visitors to different locations and thereby improve our business structure. Thank you.

I already participate.

Response PH304-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH305 – Carlos Gomez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH305

Comment PH305-1 Yes? Can you hear me?

Hi. Yeah. Carlos Gomez, long-time Dodger season ticket holder. I fully support the gondola project. I think it's very innovative. You know, this specific year, you know, attending so many games, I caught myself waiting longer than usual for the Dodger Stadium Express. I don't know if there was maybe like, a lack of funding or but I know there were just like, you know, maybe two busses going out every 50 minutes or so.

And, you know, anything that we can do to really alleviate any type of congestion or traffic, you know, for the what is 30 to 40,000 Dodger fans that go to the games or millions throughout the season would be great. I fully support this project. And we really need this project. I mean, I think it would help the surrounding community and Dodger fans in general. Go Dodgers!

Response PH305-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH306 – Lester

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH306

Comment PH306-1 Oh, hello.

Yeah, Lester [inaudible].

I just wanna say that I'm a big Dodgers fan and I support this project.

Response PH306-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH307 – Speakers 40/41

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH307

Comment PH307-1 I support the project.

Hello?

[inaudible]

I support the gondola project in Chinatown because it brings more attention business to the area.

[inaudible]

Response PH307-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH308 – Kayla

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH308

Comment PH308-1 Good evening. This is Kayla. I am a resident of Chinatown, and I wanted to call in today to oppose the gondola project for a few reasons. There's no additional parking accommodations for those 3,000 vehicles you mentioned that would presumably be arriving at Union Station. So the traffic won't really be alleviated at all. The congestion will just shift south a few blocks.

Response PH308-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage

them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel.

Comment PH308-2 It's also hard to be convinced of an emission reduction plan that's only one mile long, especially when the vehicles will still be driving to the gondola terminal, but more so than the traffic in the parking.

Response PH308-2 Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Contrary to the comment, the Draft EIR analysis reports that the proposed Project would reduce air pollutant emissions in the area. As shown in Table 3.3-5, Maximum Mass Daily Emissions Due to Operation of the Project, of the Draft EIR, the proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles travelled (VMT) and thereby decreasing emissions compared to existing conditions. The analysis shows that VMT reduction may occur from riders' use of other transit to arrive at Los Angeles Union Station (LAUS), and that not all users would drive to LAUS. As a fixed guideway transit project, providing new high-frequency high speed transit connections between the regional transit hub of LAUS and Dodger Stadium, the proposed Project is forecast to reduce VMT, as game and event attendees shift their travel mode from driving to Dodger Stadium to utilizing transit on the proposed Project. As an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies (see Section 3.8.4 of the Draft EIR and Table C-1 through Table C-4 provided in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for additional discussion). The operational VMT and trips for the existing, Build Out, and Horizon Year that are used to calculate these mobile emissions are presented in Table A.2-3 of Draft EIR Appendix D, Air Quality/Health Risk Assessment Technical Report. Refer to Response PH308-1 for discussion of traffic.

Comment PH308-3 I'm concerned about the impacts of gentrification and displacement that were mentioned by some other commenters earlier, especially due to that property value increase in this historic but unfortunately very under-supported neighborhood.

Response PH308-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not

exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Comment PH308-4 The gondola won't support Chinatown businesses. It'll detract from them, people going from Union Station and flying right over.

Response PH308-4 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment PH308-5 It's the gondola's plan to use public rights of way public airspace, public land. It'll impose itself on our skyline. Cars moving thousands of camera-phone equipped sports spectators back and forth between Union Station and Dodger Stadium with a full view down into our patios or gardens or homes.

Response PH308-5 As discussed in Section 2.0, Project Description, of the Draft EIR, one of the proposed Project objectives is to maximize the proposed Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and, as discussed in Topical Response M, Comparable Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where

the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Comment PH308-6 The gondola's not needed year-round, but it'll be visible and audible year round like a permanent string of cables and towers and our sidewalks and our skies.

Response PH308-6 Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant.

Comment PH308-7 Lastly, it's unclear who will pay for this project, but it's clear that a billionaire will profit from it. It's for these reasons that I oppose the gondola. Thank you. Thank you very much.

Response PH308-7 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue

on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter PH309 – Monica Vasquez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH309

Comment PH309-1 Yes. Hi. Yes.

My name is Monica Vasquez, and I fully support the gondola project. This not only will help with the traffic and pollution and stuff like that, but now I live [inaudible] and it has some of the worst traffic, too. And this is [inaudible]. Less traffic and more [inaudible] transportation, which the gondola will provide all of that.

Plus it'll be good for the people. And this project will help the region with traffic. Like I said, the pollution, the time of traffic as well, because driving [inaudible] my house to the Dodger Stadium. It's only a short distance, but once in traffic it's a long way. And like I said, I just I just called to support the [inaudible] and gondola project and I hope you guys do, too.

Thank you so much.

Response PH309-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH310 – Ms. Wong

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH310

Comment PH310-1 Hello?

[inaudible]

So my name Ms. Wong, I'm a local resident of the Chinatown area. I'm pulling support in favor of this project because it's going to bring a lot of good things to the area. It's going to help with the air quality and relieve the traffic and various benefits and welfare for the neighborhood. Thank you.

Response PH310-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH311 - Jason

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH311

Comment PH311-1 Hi. Yes, this is Jason [inaudible]. I'm with the Los Angeles Chinatown Corporation. We are the founding organization that actually founded Chinatown when it was displaced, when it moved from Union Station to where it's at now. We own Central Plaza and we are one of the oldest organizations in Chinatown. Conceptually, the board has voted to support the gondola project, but conceptually there are still things that still need to be worked out.

But in general, we do support it for several reasons. Reasons to for reasons no other than Chinatown is completely dead. It has been dead for many, many years. I have lived in Chinatown before I moved out and nothing has happened. And so with the gondola project, this attraction will hopefully bring in visitors, people to see Chinatown, shop, visit, eat, and our merchants need it.

Despite what all the opposing arguments are, our merchants do need some kind of revitalization and right now our merchants are suffering. I speak to our merchants all the time and they support the gondola because they need people in Chinatown to serve, to make money, and to hopefully get Chinatown out of being one of the poorest area in the community.

Thank you.

Response PH311-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment Letter PH312 – Sharon Coleman

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH312

Comment PH312-1 My name is Sharon Coleman. I am president of the National Association [inaudible] Contractors. And I just want to say I support this mission and I agree with the previous caller in reference to making sure that we have not only minority participation on the building of the actual structure, but on the long-term aspects of it.

That's my comment.

Response PH312-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses during the proposed Project's construction phase.

Comment Letter PH313 – Sarah Van de Camp

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH313

Comment PH313-1 Hi. Thank you so much. My name's Sarah Van de Camp and I'm a resident of East L.A., specifically Cypress Park. I support this project. I think it's really no secret that we desperately need zero-emission solutions and climate solutions. We also need more public transportation options and connectivity in Los Angeles. So I wholeheartedly support this project and the efforts by climate resolve.

And I'm also really excited about the opportunity that aerial gondola technology presents in Los Angeles as well. This is a super innovative idea and I really do think it would be good for the city. Thank you so much.

Response PH313-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH314 – Bill

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH314

Comment PH314-1 Hi, my name is Bill [inaudible] with people organized for Westside Renewal. Yes, we oppose this project. I'm concerned about a couple of things in the EIR in particular.

Response PH314-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address and environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH314-2 One is I'm concerned about the way this project fits in with the larger plan to redevelop the parking lots around Dodger Stadium. I do not believe that the actual goal of this project is to facilitate the growth of business in Chinatown, but to facilitate an excuse to redevelop the parking lots that Frank McCourt still has an interest in.

This is not really a secret that this was part of the goal. They were discussing it in the press over a decade ago, and I always find very, very wealthy individuals boosting a project that serves their interests and trying to use the public infrastructure to do that as very suspect.

Response PH314-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment PH314-3 I think people have already talked about the way that the traffic study is flawed.

I don't see how adding a gondola really takes cars off the road. It doesn't do anything to get people to take transit to where they can get the gondola. I do not believe it's a

first and last-mile solution. I think it's going to become an only mile solution. And what folks will do in practice is really take the gondola as kind of more a tourist attraction type thing and bring traffic and parking into the community.

Response PH314-3 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel. The Draft EIR's transportation analyses were prepared by experts in the field, as set forth in Section 8.0, List of Preparers, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.[2] Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment PH314-4 And of course, once that redevelopment around Dodger Stadium happens, I don't see those folks even spending that much money or time in Chinatown. When we talk to members in the community, nobody says the thing that we need most is a gondola. Folks need affordable housing, but they also need like local level traffic solutions, like a traffic light to get from William Meade Public housing community to the historic state park, for instance.

We need to invest in what folks actually need and do bottom-up planning. This is a misuse of the public process. Thank you.

Response PH314-4 Refer to Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property for a discussion of how the proposed Project solely proposes an aerial gondola system. The proposed Project does not include other development, and neither the Project

[2] Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development housing and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter PH315 – Diane Weiss

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH315

Comment PH315-1 Hi. Can you hear me? Okay. Hi. I am 100% opposed to this project.

Response PH315-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment PH315-2 In the last 50 years, which is barely a blip of time, we have lost two-thirds of our worldwide wildlife. Two-thirds in 50 years. Recently, it was documented, also that documentation can be found through the World Wildlife Fund. It's also been documented that currently there are over 150,000 species that are threatened or extinction currently due to man-made endeavors such as this kind of short-sighted one,

We are the stewards of the environment and we just forget about that every time some billionaire wants to have a seasonal vanity project that they will benefit from.

I know the wildlife doesn't buy Dodger tickets. Wildlife doesn't buy amusement park tickets.

And it doesn't want a tourist trap. We already have enough of all of those things. At some point we have to realize that we have to preserve our environment because even if you're a billionaire developer, you have to understand that when we kill the environment, we kill ourselves.

Response PH315-2 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from the proposed Project would be less than significant. Further, as discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts.

Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's

ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project

Comment PH315-3 And even the highly skilled greenwasher, like this whole plan has been presented as, it's pretty dubious.

We need to get our priorities straight and quit thinking so short term in our city.

Response PH315-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation,

Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel.

Comment Letter PH316 – Drew Miller

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH316

Comment PH316-1 Hi, my name is Drew Miller, and I am calling to voice my full support for the gondola. The proposed Los Angeles Aerial Rapid Transit Project presents an important opportunity to advance zero emissions transportation and slash carbon emissions at a crucial time in human history. It would be the first permanent rapid transit connection from the region's transportation hub, Union Station, to Dodger Stadium, as well as a region park.

This will remove thousands of vehicles from the road, reducing congestion and pollution while providing a unique and safe experience for the community. As rising temperatures from human-caused greenhouse gases threaten the city of Los Angeles and the world as we know it, the time for action is now. Thank you.

Response PH316-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH317 – Dawn Huang

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH317

Comment PH317-1 Hi. Can you hear me? My name is Dawn Huang and while I agree that Los Angeles is much more in need of public transportation, a gondola going to a sports stadium is a bizarre choice. Have any of you ridden a gondola? How many people does a gondola move and how quickly? I know taking gondolas in my life, including the Roosevelt Island gondola, known as the aerial tramway, they're very slow and they're huge expense that will be funded by our city for a slow moving mile that doesn't take that many people.

Response PH317-1 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing

how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. The proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH317-2 I lived in New York City for years and saw the aerial tramway overhead and underneath.

Few people felt like walking underneath it.

Response PH317-2 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations, including the Roosevelt Island Tramway in New York City, demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH317-3 Apparently only two properties in the world, according to Roosevelt Island's aerial tramway, can make these systems. So it's a French company that built the Roosevelt Island one that was only used temporarily and meant to be used temporarily.

Response PH317-3 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Comments from Doppelmayr USA, Inc. and Leitner-Poma of

America, Inc., the two manufacturers of 3S gondola systems. Refer to Response PH317-2 for discussion of the Roosevelt Island Tramway.

Comment PH317-4 It's currently privately run and pays New York City a franchise free, while subways and cars are much more often used by residents due to speed. I never went to Roosevelt Island in those 20 years on the tramway while I did drive and take the subway. Not all people are comfortable with aerial travel.

Response PH317-4 Refer to Response PH317-3 for discussion of the Roosevelt Island Tramway. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations, including the Roosevelt Island Tramway in New York City, demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. Refer to Response PH317-1 for discussion of the need for the proposed Project and how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment PH317-5 There's a large percentage of the population who are afraid of heights. The tram often wasn't used by the residents because of its slowness and was used often by tourists or in a Spider-Man movie. Although the tramway was opened in 1976 in July it was intended to be just temporary transportation while the subway was getting connected. And then the subway fell behind schedule and it became a permanent fixture.

Response PH317-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Responses PH317-2 through PH317-4 for discussion of the Roosevelt Island Tramway.

Comment PH317-6 But in the 50 years it was in existence, it was only moved 26 million people while the subway moved millions a day, billions of people since. And then when the subway was completed in 1989, ridership drastically went down. So as a historian and documentary filmmaker, I've studied the impacts of public policy and transport policies on community [inaudible].

Response PH317-6 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Responses PH317-2 through PH317-4 for discussion of the Roosevelt Island Tramway.

Comment PH317-7 Chinatown's historically suffered from being moved already, past harassment and a past massacre perpetrated by non-Chinese. In the past, China and the US. California looks like.

Well, racism is a part here. You chose a community that can't speak enough for itself and is in depression. So I believe that I should be able to speak and to use fund public funding to fund a private enterprise for a specific group of people, baseball fans, which is not the whole population. You could funnel your money into actual metro service for the entire city. Thank you very much.

Response PH317-7 Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process.

Comment Letter PH318 - Carlos

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH318

Comment PH318-1 Hi, my name is Carlos [inaudible] Senior. [inaudible] I support the project, the gondola. We are taking people out of town, so I'm fine with [inaudible] and it's really a pain in the neck trying to get parking [inaudible]. Now [inaudible] much benefit for the community. It will be [inaudible] the gondolas going to go through [inaudible] support the project is also [inaudible] going to Dodger Stadium and it's good for people who don't [inaudible] parking lot [inaudible] and they like to take their kids and their families for, you know, [inaudible] and bottom line 100%, hopefully that this project can get approval. Thank you for listening

Response PH318-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH319 - Eric

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH319

Comment PH319-1 Yeah. Hello. My name is, my name is Eric. I've lived in Echo Park within a gondola ride of Dodger Stadium for about 13 years, but on the other side of the stadium. On game nights when I'm leaving my house, it often means waiting like ten minutes just to exit my driveway. So I totally understand how important it is to find new ways to bring visitors to Dodger Stadium.

But this project won't bring enough people fast enough to justify the intrusion into the community's backyards. It's not the answer to our problems. It will divert cars to Chinatown in Union Station if anything. If you don't get rid of the parking, you'll never get rid of the cars. Let's call this gondola project what it is. It's silly. It's a novelty and it's a [inaudible].

Response PH319-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in

traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the Parking Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified.

Comment PH319-2 This [inaudible] achievement will enrich Frank McCourt and be a shiny new thing to show up at the Olympics. The community doesn't want this. Stop wasting time and money talking about it.

Response PH319-2 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Response PH319-1 for an overview of the need for the proposed Project.

Comment PH319-3 Please just run more busses and dedicated lanes to run even when there is no game. There's a beautiful park up there that's more or less inaccessible by transit. We don't want novelty tourist transit. We want robust systems to access our green spaces. This project ain't it. Thank you.

Response PH319-3 Refer to Response PH319-1 for an overview of the need for the proposed Project, including improving mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State

Historic Park. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program.

Comment Letter PH320 – Monica Cruz

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH320

Comment PH320-1 Hi everyone. I am Monica and I support the [inaudible] congestion wants to find a solution that will enhance our communications [inaudible] as a zero emission transit. So in this case, [inaudible] we support this project as we know that aerial rapid transit through this road, through extraordinary innovation [inaudible].

Response PH320-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH321 – Michael Berg

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH321

Comment PH321-1 Hello.

I'm so sorry. I started talking without even [inaudible]. Anyway, thank you. My name is Michael Berg and I am a Los Angeles Union Station Historical Society board member, also the founder of the Aliso Street Manufacturer [inaudible] Society, and also a member of the Chinese Historical Society that's along the route. This is nothing more than a carnival ride.

Response PH321-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment PH321-2 Los Angeles private transport projects historically have proven to be financially and viable for carrying [inaudible] passengers, i.e. [inaudible].

Response PH321-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response PH321-1 for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and

Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH321-3 And I agree with the California Endowment's position that the ruining of the view scape of their building severely degrades the quality of their company, and that by doing the same, [inaudible] damage in front of Union Station by that enormous terminal on Alameda Street blocks a world class architectural wonder, one of the most iconic and culturally significant architectural masterpieces in all of Los Angeles.

Response PH321-3 Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's Alameda Tower, which would be less than significant, and for visual simulations of the proposed Project's Alameda Tower. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. And, as discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project's Alameda Station is in an urban area that currently has a mix of architectural styles, building materials and colors, as well as a mix of primarily traditional and some modern style buildings. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project's design goal is to develop a common architectural design that unifies the overall aerial gondola system, while allowing for each major component to contribute to the respective localized urban condition. The Alameda Station's platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the "shell" roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo. The proposed Project would also integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's

analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment PH321-4 We would like to, I would like to say that I believe this project is not viable for anything, and the damage to these [inaudible] is completely irresponsible and unacceptable. And it's amazing to me to think that all of this could be changed if they just put in a subway to Dodger Stadium would solve all of the issues you're talking about.

Response PH321-4 Refer to Response PH321-2 for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways.

Comment PH321-5 And I did a little calculation. You have to unload 80 people every minute, to 5,000 people an hour. And I'd like to know how you plan to load and unload 80 people a minute to meet that 5,000 number. I believe that traffic stats that you gave a flood of.

Thank you.

Response PH321-5 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). The cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds).

The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd. To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd.

Comment Letter PH322 – Alex Alvarez

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH322

Comment PH322-1 Oh, sorry about that. Good evening. My name is Alex Alvarez. We all have to deal with the traffic around Dodger Stadium on game days.

The gondolas could take 3,000 cars off the road, making it easier to get around and reducing our pollution from cars.

I support the gondola, [inaudible] because it would be great for Los Angeles, for the Dodgers and their fans.

And you for taking the opportunity to take my comment and have a good night.

Response PH322-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH323 – Speaker 58

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH323

Comment PH323-1 Hello?

Yes, my name is [inaudible] for the community and I am [inaudible] and I would like to thank you for your time.

Response PH323-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted

Comment Letter PH324 - Crystal

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH324

Comment PH324-1 Hi. My name is [Crystal]. [inaudible]. Thank you.

Response PH324-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted

Comment Letter PH325 – Ron

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH325

Comment PH325-1 Hello.

Right. Thank you. I can't stress enough how opposed I am for this project.

There's not enough time really to address the countless reasons that this is a bad idea. Even if I didn't live in the neighborhood, I'd still be against this project. I'm all for environmental protection and for business people to do well and to be successful. But this whole project is built on a lie.

Response PH325-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH325-2 It's not about saving the environment, but about increasing the fortunes of a billionaire. There's no way that this project will be paid for by proponents or pay for itself, and taxpayers do not need to be put on the hook for this.

Response PH325-2 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed

Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH325-3 There are other ways to reduce emissions. California's already on track to have automobiles become environmentally safer. If you live in the neighborhood, there's nothing environmentally friendly about this project. Rather, it's environmentally ruinous to everything it touches or is in its vicinity.

Response PH325-3 The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO2e. The lifetime VMT reduction of the project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their

surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment PH325-4 It offers nothing but [inaudible]. Generally impacts would not be significant until they are, and they will be. If whatever benefits to the business community there could possibly be would already be provided by the Metro rail. This will not add to anything. If anybody thinks Chinatown is dead, maybe they could encourage businesses to paint their buildings so that the buildings looked alive.

Response PH325-4 Refer to the Executive Summary of the Draft EIR for discussion of how the proposed Project operation would have less than significant environmental impacts. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, including the proposed Project's potential partnerships with and benefits to local businesses. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH325-5 But actually I have one more comment. The scheme just screams the old saying about preferring to ask for forgiveness instead of permission. And surely things are going to go wrong and there'll be no way to forgive those things from happening. Thank you.

Response PH325-5 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment Letter PH326 – Katie

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH326

Comment PH326-1 Hey, can you hear me? Yes, thank you. My name is Katie. I live right by Dodger Stadium. I do agree that we need better public transit on game days. It's very difficult to leave my house and go anywhere, but the gondola is the opposite of that. The gondola won't make it easier to take public transit to Dodger Stadium. It won't help our neighbors access effective and affordable public transit.

Response PH326-1 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment PH326-2 And frankly, it won't help anyone get anywhere that they need to go. It's going to disrupt our neighborhood. And it's, as other people have said, an entirely unrealistic plan. The numbers that are, that it says it will bring of people is just like, that's a wish. That's not reality. And as a taxpayer, I do not agree with the city paying hundreds of millions of dollars, of dollars of our own money for something that none of us want or need.

Response PH326-2 Refer to Response PH326-1 for an overview of the need for the proposed Project. Refer to Section 2.1, Overview of the Project, of the Draft EIR, discussing how the

proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment PH326-3 We need affordable housing. We need streets where we can ride our bikes and use accessible public transportation. We need to be able to have public transportation that goes to places that we actually need to go in a way that gets us there.

And that's not what the gondola does. So we really do not need the gondola and we are opposed to it in our neighborhood. Thank you.

Response PH326-3 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Response PH326-1 for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH327 – Yeg Lin Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH327

Comment PH327-1 Support Gondola, brings more business

Response PH327-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH328 – Wu Shuo Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH328

Comment PH328-1 Support Gondola

Response PH328-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH329 – Zhey Wen Zhen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH329

Comment PH329-1 Support Gondola

Response PH329-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH330 – Lorenz G Biyun

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH330

Comment PH330-1 Support Gondola, brings more business to Chinatown

Response PH330-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH331 – Aicui Zhou

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH331

Comment PH331-1 Support Gondola, brings more business to Chinatown

Response PH331-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH332 – Zhou

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH332

Comment PH332-1 Support

Response PH332-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH333 – Wei Mei

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH333

Comment PH333-1 Support Gondola

Response PH333-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH334 – Mei Kven Li

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH334

Comment PH334-1 Support Gondola

Response PH334-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH335 – Lean Ah Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH335

Comment PH335-1 Ok to build the gondola bring more people here

Response PH335-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH336 – Sean Lee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH336

Comment PH336-1 It would benifit the traffic when there is dodger games

Response PH336-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH337 – Lee Suan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH337

Comment PH337-1 It would benefit the traffic when there is dodger games

Response PH337-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH338 – Josefina Hanas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH338

Comment PH338-1 I urgently need this project to be finished, I don't like the crowds, they litter, the cut plants when they pass by, they block driveways with their cars.

Response PH338-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH339 – Magdalena Luna

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH339

Comment PH339-1 I am pleased that the project is done soon. That would save us some headaches related to our houses' parking, also less garbage.

Response PH339-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH340 – Isabel Rios

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH340

Comment PH340-1 I think it will be very helpful with regards to traffic, especially for people like me, who suffer panic attacks, we could be stuck for long on the road; over there, we won't even have time to feel bad because it will only take 7 minutes, I hope I can ride it one day and that it helps other people that suffer anxiety or panic attacks so they want to ride this means of transportation. I rode one in Chicago.

Response PH340-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH341 – Maria Ortega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH341

Comment PH341-1 I support the Gondola Project, it seems to me like a good idea and I hope it is done soon so I can see it, because who knows how long it is going to take and I am already an old woman.

Response PH341-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH342 – Enrique Luna

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH342

Comment PH342-1 I want this Gondola Project to be ready soon, it would reduce a lot of traffic on our street and there won't be so many cars blocking our driveways, they block our streets and sometimes our cars have to stay far away from our home until very late.

Response PH342-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH343 – Bertha Magona

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH343

Comment PH343-1 I support the Gondola because it will bring more business to us,

Response PH343-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment PH343-2 also because it will help with traffic and because it will be free for us, the residents in the area.

Response PH343-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter PH344 – Araceli Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH344

Comment PH344-1 I support the Gondola and I hope they won't come and park here because they would take the bus or train, and the gondola to Union Station.

Response PH344-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH345 – Alicia Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH345

Comment PH345-1 A very good idea to reduce traffic and clean the environment, it was about time to have something like that here in Los Angeles

Response PH345-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH346 – Jesus Rico

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH346

Comment PH346-1 I heard about this project 10 years ago.

It should already be built after so long, it would help a lot to our area in terms of parking spots, because they park here and they walk to the stadium.

Response PH346-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH347 – Andrea Hernandez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH347

Comment PH347-1 I like it because it is very fast, just 7 minutes to get to the stadium it will carry 5000 people per hour and will reduce pollution.

Response PH347-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH348 – Bertha

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH348

Comment PH348-1 I support the gondola, I think it is a good idea.

Response PH348-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH348-2 There won't be so much traffic anymore and we will have cleaner air.

Response PH348-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH349 – Rosa Juarez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH349

Comment PH349-1 I support the Transit plans because they will help reduce traffic and because the air will be less polluted.

Response PH349-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH350 – Maribel Aceves

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH350

Comment PH350-1 This new project is a good idea because many more people will visit Chinatown and that would help their community, and will also reduce traffic.

Response PH350-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH351 – Karen Alfaro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH351

Comment PH351-1 I am all in for this new project because a lot more people will be curious to visit other small businesses in the area.

Response PH351-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH351-2 Secondly I believe that the aerial transit will reduce traffic and last one of the most catching good facts is less polution.

Response PH351-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH352 – Saul Duran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH352

Comment PH352-1 It would bring many benefits

It would benefit in terms of traffic, less pollution, more tourists, less time to get to the stadium and get back home, it will alleviate stress, because there won't be as much traffic as now;

Response PH352-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment PH352-2 it would be modern, efficient and take stress away from traffic.

Response PH352-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH353 – Angel Ruiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH353

Comment PH353-1 Good Idea cause it's good for the environment and cause is going to reduce traffic

Response PH353-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH354 – Stephanie

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH354

Comment PH354-1 Good idea. Is going to cut down traffic. Will help us get quiquer where wwe want to go or have to go cause we cant get out on game day

Response PH354-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH355 – Alexis Cuevas

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH355

Comment PH355-1 The gondola could remove up to 3,000 cars from the neighborhood streets before and after events at Dodgers Stadium, helping reduce traffic and reducing the need to park in the local community

Response PH355-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH356 – Manuel Antonio Vasquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH356

Comment PH356-1 I support this means of transportation, it is a good project, new transportation for the community. It helps with traffic and it will clean our air.

Response PH356-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH357 – Alfredo Gutierrez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH357

Comment PH357-1 This project is about less cars, less pollution and safer & healthier neighborhoods. I support the Dodger Stadium Gondola.

Response PH357-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH358 – Cynthia Gutierrez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH358

Comment PH358-1 The gondola is a great project that will aid with the traffic situation in our city.

Response PH358-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH359 – Alicia Jimenez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH359

Comment PH359-1 Great project, up to 3000 cars would be removed from the streets in the neighborhood before and after the Dodgers' events, it would ease local traffic and reduce the need to park within the local community.

Response PH359-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH360 – Aquiles Castino

The full bracketed comment is provided in Appendix B, Public Hearing Transcripts, of the Final EIR, for reference.

Responses to PH360

Comment PH360-1 I like the project but what I don't like is the exit is for away from the stadium. I prefer to have the stop by the dodgers store. Easeir for people that have trouble to walk.

Response PH360-1 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the safety features of the proposed Project and how it meets ADA requirements. The station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be at stations in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop a cabin is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA. The pedestrian pathway from the Dodger Stadium Station to the Stadium would be ADA compliant.

Comment PH360-2 Also please offer rides to people with disability to walk from their car to the stadium.

Response PH360-2 Refer to Response PH360-1 for discussion of the proposed Project's compliance with ADA requirements.

Comment Letter PH361 – Jose Luis Ramos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH361

Comment PH361-1 This project in Los Angeles would be very helpful to the local community, I have been near the Dodger Stadium for many years now and there will be much less traffic with this project. I hope it is built as soon as possible. Thank you.

Response PH361-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH362 – Giovanni Duran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH362

Comment PH362-1 Great Ideas. It's convinent and reduces traffic and good for the enviornment.

Response PH362-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH363 – Edith Salmeron

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH363

Comment PH363-1 It is an excellent project, my neighborhood has one of the worst traffic and pollution problems in all Los Angeles. We want and deserve cleaner air.

Response PH363-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter PH364 – Elena Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to PH364

Comment PH364-1 I like the project because it would also be a tourist attraction, not to mention that it would be beneficial in terms of traffic and less pollution here in the area.

Response PH364-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

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Section 7.0 | Mitigation Monitoring and Reporting Program

7.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of their approval and development. An Environmental Impact Report has been prepared to analyze and address the potential environmental impacts of the proposed Project, identifying project design features or recommending mitigation measures in order to avoid or substantially lessen the significant environmental impacts associated with the proposed Project. As the lead agency for the proposed Project, Metro is responsible for administering and implementing the MMRP, which has been prepared in compliance with CEQA, including Public Resources Code section 21081.6 and CEQA Guidelines section 15097. The decision makers must define specific monitoring and reporting requirements to be enforced during implementation of the proposed Project. The primary purpose of the MMRP is to monitor the implementation of the project design features (PDFs) and mitigation measures (MMs) identified in the Draft and Final EIR.

7.2 ORGANIZATION

As shown in **Table 7-1, Mitigation Monitoring and Reporting Program**, below, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying discussion of the following:

- **Responsible Party:** The entity accountable for the action.
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Enforcement Agency:** The agency or agencies with the power to enforce the project design feature or mitigation measure.
- **Monitoring Phase:** The phase of the Project during which the project design feature or mitigation measure shall be monitored.
- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored.
- **Action(s) Indicating Compliance:** The action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the identified project design feature or required mitigation measure has been implemented.

7.3 PROGRAM MODIFICATION

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made subject to Metro approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMRP and the need to protect the

environment. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The proposed Project shall be in substantial conformance with the PDFs and MMs contained in this MMRP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMRP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project-related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not in and of itself require a modification to any proposed Project discretionary approval unless the Director of Planning for Metro as the Lead Agency also finds that the change to the PDF or MM results in a substantial change to the proposed Project or the non-environmental conditions of approval.

Table 7-1: Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Aesthetics					
AES-PDF-A: Project Lighting. The Project would also include the following Project Design Features related to lighting: • Building Lighting will not exceed 60 watts. • Building Lighting outdoor luminaires will not exceed 6200 initial lumens. • Sign Lighting luminance will not exceed 10,000 candelas per m2 (cd/m2) during the day from after sunrise until 45 minutes prior to sunset. Sign Lighting will not exceed 300 cd/m2 at night from sunset until 45 minutes prior to sunrise. • Sign Lighting luminance shall transition smoothly from daytime luminance to nighttime luminance and vice versa. • Illuminated signs that have the potential to exceed 300 cd/m2 will include an electronic control mechanism to reduce sign luminance to 300 cd/m2 at any time when ambient sunlight is less than 100 footcandles (fc).	Project Sponsor Lighting Professional	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Lighting Professional Issuance of Certificate of Occupancy
Air Quality					
AIR-PDF-A: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA.	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles and South Coast Air Quality Management District	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Submittal of Compliance Report
Biological Resources					
BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line	Project Sponsor Arborist or Landscape Contractor Construction Contractor	Metro and/or the City of Los Angeles (Department of Public Works Urban Forestry) and/or State Department of Parks and Recreation	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.					
BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan. The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components: 1. Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities. 2. An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species. 3. Annual reporting criteria and requirements.	Project Sponsor Qualified Biologist	Metro and/or California Department of Fish and Wildlife	Prior to Certificate of Occupancy (Submittal of Plan) Operations, first 5 years (Annual Monitoring)	Once, prior to Certificate of Occupancy (Submittal of Plan) Annually, for first 5 years	Submittal of Avian Collision Mitigation, Monitoring, and Adaptive Management Plan Annual Reporting, for first 5 years
BIO-PDF-C: Cabin Window Features. The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.	Project Sponsor Qualified Biologist	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Qualified Biologist Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
BIO-PDF-D: The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.	Project Operator Pest Control Service Provider	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Inclusion of requirement in Pest Control Service Agreement Issuance of Certificate of Occupancy
BIO-PDF-E: **Tree Disease Management**. Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.	Project Sponsor Arborist or Landscape Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction (Tree Removal)	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction (Tree Removal)	Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit Compliance Certificate by Arborist or Landscape Contractor Submittal of Compliance Report
BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees: • City of Los Angeles: ○ "Protected" Trees: 4:1 ○ Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1 ○ "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1) • California Department of Parks and Recreation: At least 1:1 • Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1	Project Sponsor Arborist or Landscape Contractor	Metro and/or the City of Los Angeles and/or Department of California Parks and Recreation and/or Caltrans	Prior to Certificate of Occupancy	Once, prior to Certificate of Occupancy	Compliance Certificate by Arborist or Landscape Contractor Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
BIO-PDF-G: Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction (Tree Removal)	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction (Tree Removal)	Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit Submittal of Compliance Report
BIO-PDF-H: Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Compliance Certificate by Qualified Biologist Issuance of Applicable Building Permit Inclusion of requirement in Construction Plan Submittal of Compliance Report
MM-BIO-A: *Avoid and minimize project related impacts to special-status and/or roosting bat species*. During the maternity season (April 15 through August 31) prior to construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower), because these locations	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Pre-Construction Field Survey by Qualified Biologist Compliance Certificate and Report by Qualified Biologist

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
provide potentially suitable habitat. A visual inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed using acoustic recognition technology to determine if any maternity roosts are present. To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented: <u>At the SR-110 Overpass</u> Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and vibration) could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist. To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented: <u>Trees</u> All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree					Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
removal. Palm trees are present at the Alameda Station site along Alameda Street and eucalyptus trees are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist. • If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season, when the young are self-sufficient. If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have significantly lowered their physiological state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active. • Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16 through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days. ○ Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately, or, after emergence, will avoid returning to the roost. ○ Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist, and then the limb with the potential roost would be removed on Day 2. • Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal. • The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities.					
MM-BIO-B: *Avoid and minimize project-related impacts to nesting birds.* To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction activities that may occur during the nesting season, the following mitigation measure shall be implemented: • Construction activities, including the clearance of trees potentially suitable for nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Pre-Construction Field Survey by Qualified Biologist Compliance Certificate and Report by Qualified Biologist Inclusion of requirement in Construction Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
activities must occur within this time period, the following measures shall be employed: ○ A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded. ○ A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300- to 500-foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis, taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site-specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager, and all Project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.					Issuance of Applicable Building Permit Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
○ Buffers will be delineated on-site with bright flagging for easy identification by project staff. The on-site construction supervisor and operator staff will be notified of the nest and the buffer limits, and instructed of the sensitivity of the area to ensure the buffer is maintained. ○ A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season.					
Cultural Resources					
CUL-PDF-A: Pre-Construction Documentation of The Winery. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The full northern elevation (facing Cesar E. Chavez Avenue) and i. The roofline, foundation, and any door, window, or walkway openings, ii. Detail views showing the typical existing condition of the exterior wall, and	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction	Once, prior to Issuance of Applicable Building Permits for the Alameda Station (proof of compliance)	Pre-Construction Documentation by Historic Preservation Professional Issuance of Applicable Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
iii. Detail views showing any existing damage to the exterior such as cracks or spalling. b. West elevation (facing Olvera Street), and i. The roofline, foundation, and any door, window, or walkway openings, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. c. East elevation (facing Alameda Street) i. The roofline and foundation, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to only be distributed to repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
descriptive data, index to photographs, photo key plan, and photographs. c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs.					
CUL-PDF-B: Post-Construction Documentation of The Winery. Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Post-Construction	Once, Post-Construction of the Alameda Station Once, if Repairs Required, Post-Repairs	Post-Construction Documentation by Historic Preservation Professional If Repairs Required, Repairs within 12 Months; Completion of Repairs shall not Delay Issuance of Certificate of Occupancy
CUL-PDF-C: Pre-Construction Documentation. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the *El Grito* mural, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The entirety of the *El Grito* mural from edge to edge, looking straight on	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction	Once, prior to Issuance of Building Permits for the Alameda Station (proof of compliance)	Pre-Construction Documentation by Historic Preservation Professional Issuance of Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
b. The left half of the *El Grito* mural looking straight on c. The right half of the *El Grito* mural looking straight on d. Oblique views illustrating the curvature of the wall e. Sequential photographs showing the various panels and subjects in greater detail f. The back and sides of the curved wall on which the *El Grito* mural is located, and g. Detail views showing: i. Typical profile view of the *El Grito* mural (e.g., showing the depth of the tiles on the substrate) ii. Notch shapes at the top two corners (two views, left and right) iii. Curved shape of the sides of the *El Grito* mural (two views, left and right side) iv. Typical grout between tiles in two or more locations, v. Bottom edge where the *El Grito* mural meets the plaza floor vi. Any existing damage or deterioration prior to construction 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
be distributed to only repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs.					
CUL-PDF-D: Protection During Adjacent Construction. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will ensure that the *El Grito* mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for protecting historical resources during nearby construction, the following measures, at a minimum, should be implemented:	Project Sponsor Historic Preservation Professional Construction Contractor	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction Construction	Once, prior to Issuance of Applicable Building Permits for the Alameda Station (proof of compliance) Periodic Field Inspections during Construction	Documentation by Historic Preservation Professional Issuance of Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
1. Vibration monitoring equipment (VIB-A) should be carefully installed so that it does not permanently damage the face of the *El Grito* mural. 2. The *El Grito* mural should be cushioned and buttressed from either side of the wall with padded wood supports. The padding may consist of insulating foam or similar material. 3. A protective barrier or barriers made from plywood should be installed over the front, back, top, and sides of the *El Grito* mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable panels or a similar feature to ensure the vibration monitors and mural can be visually inspected during construction monitoring (CUL-PDF-C). 4. Plastic tarp or polyethylene sheeting should be secured over the wood barriers to protect against the accumulation of dust or contact with materials such as uncured concrete or other liquids that could damage or mark the surface of the *El Grito* mural. All of the protective measures described above should be installed and secured in such a way that does not damage the *El Grito* mural or the wall on which it is located. The barrier will not be physically attached to the *El Grito* mural or wall with screws, nails, or other fasteners.					
CUL-PDF-E: Construction Monitoring Plan (Built Resources). Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the DCA. The Construction Monitoring Plan will identify specific project milestones at which a qualified professional meeting the Secretary of the Interior's Standards for architectural history or historic architecture will be notified by the Project Sponsor or Project Sponsor's contractor to visit the site and observe and document the *El Grito* mural's condition. Details will be recorded in construction monitoring	Project Sponsor Historic Preservation Professional Construction Contractor	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction Construction Post-Construction	Once, Pre-Construction of the Alameda Station Periodic Field Inspections during Construction (after each phase of construction) Once, Post-Construction Once, if Repairs Required, Post-Repairs	Construction Monitoring Plan and other Documentation by Historic Preservation Professional If Repairs Required, Repairs within 12 Months; Completion of Repairs shall not Delay Issuance of

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
memorandums submitted to DCA. These milestones will include, at a minimum: 1. Pre-Construction: Before protection measures are installed (CUL-PDF-D), to confirm the baseline condition of the *El Grito* mural is still consistent with the information presented in the HABS-like documentation (CUL-PDF-C). 2. Pre-Construction: Once protection measures (CUL-PDF-D) are installed, to ensure they are sufficient, and their installation has not damaged the *El Grito* mural. 3. Construction: After each phase of active construction. 4. Post-Construction: After construction is complete and protective measures have been removed. At this stage, pictures of the *El Grito* mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the *El Grito* mural before and after construction. The Construction Monitor will also be included on notifications from the real-time vibration monitoring equipment (VIB-A). In the event that damage to the *El Grito* mural not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the Project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68.					Certificate of Occupancy
MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific Project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or the California Department of Parks and Recreation	Pre-Construction Construction Post-Construction	Once, Prior to Construction Periodic Field Inspections During Construction as Determined by the Qualified Archaeologist	Cultural Resources Monitoring and Mitigation Plan (CRMMP) by Qualified Archaeologist If There Is a Discovery That Proves

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
will lay out regulatory requirements (such as PRC § 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." Specifically, the CRMMP shall be applicable to all ground-disturbance activities extending into native soil within known archaeological sites and other areas of high sensitivity. Excavations within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at the Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of				Once Post-Construction Once, if There Is a Discovery that Proves Significant	Significant, Curation of Specimens and a Repository Submittal Report within a Year of Completion of Fieldwork; Final Report Filed with the SCCIC

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
disturbance planned for each Project component (including ground-disturbing activities in native soil within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting. If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC. For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal.					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
MM-CUL-B: Archaeological Resources Worker Training Program. To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and Los Angeles State Historic Park staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground-disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by Los Angeles State Historic Park and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find, and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or California Department of Parks and Recreation	Pre-Construction Construction	Once, Pre-Construction Periodic Field Inspections during Construction	Archaeological Resources Worker Training Program by Qualified Archaeologist Inclusion of requirement in Construction Plan Training Submittal of Compliance Report
MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station). To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible	Project Sponsor Qualified Archaeologist	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data	Archaeological Testing Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground-disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, 19-000887 overlaps unevaluated 19-004320 which will, therefore, also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed. If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation in place is not feasible, data	Construction Contractor			Recovery Plan (proof of compliance)	If Significant Archaeological Remains Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.					
MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt. To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data Recovery Plan (proof of compliance)	Archaeological Testing Plan If Significant Archaeological Remains Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
MM-CUL-E: Archaeological Testing Plan for Los Angeles State Historic Park. To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC § 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the Area of Direct Impacts for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/ preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or California Department of Parks and Recreation	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data Recovery Plan (proof of compliance)	Archaeological Testing Plan If Significant Archaeological Remains Are Discovered, Data Recovery Plan
MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station. After implementation of CUL-E, if it is found that the Los Angeles State Historic Park amenities (e.g., concessions and restroom) at the Los	Project Sponsor Qualified Archaeologist	Metro and/or the California Department of Parks and Recreation	Pre-Construction	Once, Pre-Construction	If Necessary, Reconfiguration of Locations of Los Angeles State Historic

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Angeles State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the Los Angeles State Historic Park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.	Construction Contractor				Park Amenity Structures
Geology and Soils					
MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report: The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site specific- final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). A site-specific geotechnical exploration program, along with associated laboratory testing, is necessary to complete a design-level evaluation of the geologic hazards and conditions, seismic hazards, grading conditions, and foundation capacities. The site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings, conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design. Additionally, the geotechnical report shall include recommended measures to reduce potential impacts related to landslides, subsidence, liquefaction, differential settlement, expansive soils, soil corrosivity, or other potential ground failures induced by the proposed Project. The submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety. The Project Sponsor shall implement the recommendations contained in the approved report during project design and construction.	Project Sponsor Geotechnical Engineer	Metro and/or the City of Los Angeles (Los Angeles Department of Building and Safety)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Approval of the Site-Specific Final Geotechnical Report by Geotechnical Engineer by the City of Los Angeles (Department of Building and Safety) Issuance of Applicable Building Permit(s) Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
MM-GEO-B: Prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP): A PRMMP shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring. The qualified paleontologist shall supervise the paleontological monitor, who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist, and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials. If any paleontological materials are found, the paleontological monitor shall temporarily divert or redirect ground-disturbing activities in the area of the exposed fossil to facilitate evaluation, and if necessary, salvage. The paleontologist shall assess the discovered material(s) and provide a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Project Sponsor shall comply with the recommendations of the evaluating paleontologist, and ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the paleontologist's satisfaction. If paleontological materials are found, the paleontologist shall prepare a report identifying the resource and the recommendations proposed and implemented, within 1 year of completion of the	Project Sponsor Qualified Paleontologist Construction Contractor	Metro and/or City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) To Be Determined in Consultation with Qualified Paleontologist	Monitoring and Mitigation Plan (PRMMP) by Qualified Paleontologist In the Event that Paleontological Materials are Found, Report Prepared and Submitted to the Los Angeles County Natural History Museum within 1 Year of Completion of Fieldwork

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
fieldwork. A copy of the report shall be submitted to the Los Angeles County Natural History Museum.					
Greenhouse Gas Emissions					
GHG-PDF-A: Green Power. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.	Project Operator	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate Issuance of Certificate of Occupancy
Hazards and Hazardous Materials					
MM-HAZ-A: Prepare a Soil and Groundwater Management Plan: The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment. This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to	Project Sponsor Qualified Environmental Consultant Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Building and Safety)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Approval of Soil and Groundwater Management Plan by Qualified Environmental Consultant by the City of Los Angeles (Department of Building and Safety) Issuance of Building Permits Compliance Certificate Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.					
MM-HAZ-B: Hazardous Materials Abatement: Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 Code of Federal Regulations 1926.62 regarding lead in construction, and OSHA 29 Code of Federal Regulations 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including wetting the area to prevent possible release of hazardous materials into the air and removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.	Project Sponsor Licensed Abatement Contractor Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction (prior to Demolition of 1201 North Broadway)	Once, Plan Check Periodic Field Inspections during Pre-Construction (prior to Demolition of 1201 North Broadway)	Compliance Certificate by Licensed Abatement Contractor Issuance of Applicable Demolition Permit for 1201 North Broadway

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Land Use and Planning					
MM-LUP-A: Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.	Project Sponsor	Metro and/or California Department of Parks and Recreation	California Department of Parks and Recreation Approval Process	Once, at the Conclusion of the California Department of Parks and Recreation Approval Process	Approval of the Los Angeles State Historic Park General Plan Amendment
Noise					
NOI-PDF-A: Gondola Cabin Noise Control Features. The Project's gondola cabins shall include the following features: • Gondola cabins shall be designed with an interior-to-exterior noise reduction rating of no less than Sound Transmission Class (STC) 35. • If heating, ventilation, and air conditioning (HVAC) units are included in the gondola cabin design, they shall be designed with a sound power level of no more than 71 dBA.	Project Sponsor Gondola Cabin Manufacturer	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Gondola Cabin Manufacturer Issuance of Certificate of Occupancy
MM-NOI-A: Prepare a Construction Noise Management Plan. Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The Construction Noise Management Plan shall include the following measures to reduce noise levels: • **Noise Barriers**: Temporary construction noise barriers between the Project construction area and affected receptors shall be installed as identified below. The noise barriers shall be designed to have a sound transmission class (STC) rating of at least 25 and should have the ability to provide a range of noise reduction between 5 dBA and 15 dBA when the construction equipment is located below the elevation level of the noise barrier and there is no line-of-sight between the construction equipment and the noise-sensitive receptors. Specific locations and heights for the temporary noise	Project Sponsor Qualified Noise Consultant Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Submittal of Construction Noise Management Plan by Qualified Noise Consultant Issuance of Applicable Grading Permits Compliance Certificate by Qualified Noise Consultant

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
barriers shall include the following by Project components: • Alameda Station o For the entire duration of construction, the Project shall provide a 24-foot tall temporary noise barrier between the Project construction site and NSR 3 [Mozaic Apartments]. o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 1A [Union Station] and NSR 1B [First Five LA]. o During the Foundations and Columns phase, the Project shall provide a 10-foot temporary noise barrier between the Project construction activities occurring within Alameda Street and NSR 1A [Union Station], NSR 1B [First Five LA], NSR 2 [El Pueblo], and NSR 3 [Mozaic Apartments]. o During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 3. • Alameda Tower o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 4 [The California Endowment]. o During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 4. • Alpine Tower ○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 6 [Chinatown Senior Lofts] and NSR 7 [Homeboy Industries]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 6 and NSR 7. ○ NSR 5 [Future Residential] is currently an undeveloped City-owned parking lot and is proposed for future multi-family residential uses. If NSR 5 is occupied by residential units at the time of Project construction, the following noise barriers shall be provided: ▪ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 5. ▪ During the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and occupied residential units at NSR 5 [Future Residential]. ▪ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 5. • Chinatown/State Park Station o For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 9 [Blossom Plaza], NSR 10 [Future Residential Development], NSR 11 [Capitol Milling], and NSR 14S [Los Angeles State Park]. The noise barrier will include a gate that may be temporarily opened for access during construction hours along Spring Street for construction access. o For the entire duration of construction, the Project shall provide a 10-foot temporary noise barrier between the Chinatown / State Park Station and NSR 8 [College Station] and NSR 12 [Future Residential Development]. o During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 8, NSR 12, and NSR 14S. • Broadway Junction o For the entire duration of construction, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 13 [Future Development], NSR 14N [Los Angeles State Historic Park], and NSR 17 [Low Rise Residential]. o During the Demolition phase and the Foundations and Columns phase, the Project shall provide a 24-foot temporary noise barrier					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
between the Project construction site and NSR 16 [Cathedral High School]. ○ During the Structural Steel and Gondola Equipment Erection phase and the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] ○ During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 13, NSR 14 N, NSR 16, and NSR 17. • Stadium Tower ○ During the Foundations and Columns phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] and NSR 17 [Low Rise Residential]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between Project construction and NSR 16 and NSR 17. • **Equipment Maintenance**: Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts and shall be fitted with the best available noise suppression devices (i.e., mufflers, lagging, and/or motor enclosures).					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded. • **Electrical Sources:** When possible, on-site electrical sources shall be used to power equipment rather than diesel generators. • **Sensitive Uses:** Fixed and/or stationary equipment (e.g., generators, compressors, concrete mixers) shall be located away from noise-sensitive receptors. • **Community Outreach:** The following shall be implemented to reduce impacts to the local community related to disturbances from construction noise: o Noise Disturbance Coordinator: A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party. o Construction Notice: The construction contractor shall provide a construction notice to residents within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used and duration of construction activities, permit					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
number, name and phone number of the job superintendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator. • **Limit Idling Equipment**: Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations.					
MM-VIB-A: **Vibration Monitoring:** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for: • Vibration Monitoring Equipment: the placement of vibration monitoring equipment approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices. • Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.	Project Sponsor Qualified Vibration Consultant Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Submittal of Vibration Monitoring Plan by Qualified Vibration Consultant Issuance of Grading Permits Compliance Certificate by Qualified Vibration Consultant
MM-VIB-B: Force-Adjustable Ground Compaction Devices: For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery: • At a distance of 26 feet or more from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the	Project Sponsor Qualified Vibration Consultant Construction Contractor	Metro and/or the City of Los Angeles	Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Issuance of Building Permits Compliance Certificate by Qualified Vibration Consultant

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities. • Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), El Grito Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools.					
Transportation					
TRA-PDF-A: Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Prior to Completion of Construction	Once, Prior to Completion of Construction	Approval of Additional Visibility Enhancements by the City of Los Angeles (Los Angeles Department of Transportation) Submittal of Compliance Report Certificate of Occupancy
MM-TRA-A: Visibility Enhancements: Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at the following locations: • Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street. • Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation) and California Department of State Parks (as to the Chinatown/State Park Station)	Prior to Completion of Construction	Once, Prior to Completion of Construction	Approval of Visibility Enhancements by the City of Los Angeles (Los Angeles Department of Transportation) and California Department of State Parks (as to the Chinatown/State Park Station) Submittal of Compliance Report Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.					
MM-TRA-B: Construction Traffic Management Plan: Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate: • As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Pre-Construction	Once, Plan Check (proof of compliance)	Approval of Construction Traffic Management Plan by City of Los Angeles (Los Angeles Department of Transportation) Inclusion of requirement in Construction Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations. • Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes, shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary. • As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods. • Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction. • Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
• Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project, or as otherwise determined appropriate by City Staff. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. • Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.					
MM-TRA-C: Temporary Disaster Route Plan: Prior to the issuance of a building permit for the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall submit a temporary disaster route plan to LADOT, which shall include street closure information and detour plans in order to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Construction activities and temporary lane closures could quickly be halted in event of an emergency to allow emergency vehicles to travel through the work zones. In addition	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Pre-Construction	Once, Plan Check (proof of compliance)	Approval of Construction Traffic Management Plan by City of Los Angeles (Los Angeles Department of Transportation) Inclusion of requirement in Construction Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation. The temporary disaster route plan would be prepared for the following locations: • During those periods when construction of the Alameda Station, the Chinatown/State Park Station, and the Alameda and Alpine Towers require partial closure of one direction or full closure of both directions of Alameda Street or Spring Street.					
Tribal Cultural Resources					
MM-TCR-A Native American Monitor. Because of the potential to encounter tribal cultural resources, a Native American monitor shall be retained to monitor project-related, ground-disturbing construction activities (e.g., boring, grading, excavation, drilling, trenching) that occur after existing pavement and structures are removed at the location of the Alameda Station. If cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator (as defined in 32 CFR Section 767.8), are likely of Native American origin, then Native American monitoring may be extended to include the area of the find. The Principal Investigator will make the recommendation to the Project Sponsor and Metro if it seems the Native American monitoring should be extended. The appropriate Native American monitor shall be selected based on ongoing coordination with consulting tribes and shall be identified in the CRMMP. The CRMMP is described in Mitigation Measure CUL-A. Specifically, the CRMMP and Native American monitoring would be applicable to ground disturbance activities extending into native soils at the location of the Alameda Station and, if cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological	Project Sponsor Qualified Native American Monitor Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) To Be Determined by the Archaeological Principal Investigator	Cultural Resources Monitoring and Mitigation Plan If Cultural Resources That May Be of Native American Origin Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Principal Investigator, are likely of Native American origin. Monitoring procedures and the role and responsibilities of the Native American monitor shall be outlined in the CRMMP. In the event the Native American monitor identifies cultural or archeological resources, the monitor shall be given the authority to temporarily halt construction (if safe) within 50 feet (15 meters) of the discovery to investigate the find and contact the archaeological Principal Investigator. The Native American monitor and consulting tribe(s) shall be provided an opportunity to participate in the documentation and evaluation of the find. If a data recovery plan is prepared, the consulting tribe(s) shall be provided an opportunity to review and provide input on the plan.					
Utilities and Service Systems					
MM-USS-A: Development of a Utility Relocation Plan: Before the start of construction-related activities, including the relocation of utilities, the Project Sponsor shall coordinate with the Los Angeles Department of Water & Power, the Los Angeles Sanitation & Environment Department, the Southern California Gas Company, and Metro to prepare a Utility Relocation Plan. The Project Sponsor shall also coordinate with the utility companies to minimize impacts to services throughout the Project and obtain their approval of the Utility Relocation Plan. The Utility Relocation Plan shall be prepared, reviewed, and approved by a licensed civil engineer and, at a minimum, include the following: • Plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of the proposed Project; • Safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines; and	Project Sponsor Civil Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Water & Power, the Los Angeles Sanitation & Environment Department) and Southern California Gas Company	Pre-Construction	Once, Pre-Construction (proof of compliance)	Approval of the Utility Relocation Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
• Timing for completion of the utility relocation, which shall be scheduled to minimize disruption to the utility companies and their customers.					
Wildfire					
WFR-PDF-A: The Project will prepare a Fire Protection Plan, which will be implemented during construction of the Broadway Junction, Stadium Tower, and Dodger Stadium Station. The Fire Protection Plan will include the following measures that shall be implemented to the extent applicable in order to further reduce risks associated with ignition of wildland fire: • Prior to the start of any construction activities, a Fire Prevention Program Superintendent shall be designated to interface with the LAFD and coordinate fire watch and site fire prevention and response. • In exceedance of regulatory requirements, the Fire Prevention Program Superintendent shall prohibit hot work construction activities during Red Flag Warnings, which are issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area. • Prior to the start of any hot work construction activities, the Fire Prevention Program Superintendent will implement tiered fire watches with increased staff tasked with monitoring for ignitions during hot work activities (fire watch). The fire watch shall be provided during hot work and shall continue to monitor for a minimum of 30 minutes following completion of the hot work activities. The Fire Prevention Program Superintendent may determine during construction that this monitoring period be increased based on the potential for weather conditions that may increase the potential for sparks to be carried by the wind and result in ignition (i.e., the potential for high wind events, high temperature, and/or low relative humidity).	Project Sponsor Fire Consultant Construction Contractor	Metro and/or the City of Los Angeles (LAFD)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Period Field Inspection during Construction by Fire Prevention Program Superintendent	Fire Protection Plan by the Fire Consultant Training Records Provided to the City, LAFD, and Metro

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
• Prior to the start of any construction activities, the construction manager in coordination with the Fire Prevention Program Superintendent shall provide site fire safety training for all construction crew members, including on the regulatory requirements set forth in Section 3.20.2, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Project staff shall be trained prior to the start of construction to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. The construction manager shall maintain training records which will be available for review by Metro, the City, and LAFD. • Prior to the start of construction, the construction area shall be cleared of all dead and downed vegetation and dead or dry leaves and pine needles from the ground. Trees within the construction area shall either be removed or trimmed to keep branches a minimum of 10 feet from other trees. Vegetation within the construction area shall be controlled through periodic cutting and spraying of weeds. • Ongoing fire safety inspections and patrols of the construction site shall be integrated into Project site security procedures for the duration of construction. The assigned fire patrols shall verify the proper tools and equipment are on site, serve as a lookout for fire starts, including participating in a fire watch to make sure no residual fire exists following the completion of the construction activity. • Each construction area shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small flames. • The Fire Prevention Program Superintendent shall provide outreach and orientation services to responding fire stations including pre-staging measures prior to the start of hot work construction activities.					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
• Any fire ignited on site shall be promptly reported to LAFD.					
WFR-PDF-B: Prior to the start of construction, the Project shall provide a fuel modification zone surrounding the Stadium Tower construction site starting from the construction area perimeter of either 70 feet or until the nearest paved roadway that thins or removes all vegetation, dead or dry leaves and pine needles from the ground, and trims or remove trees to keep branches a minimum of 10 feet from other trees. The Stadium Tower construction site plan shows a buffer zone of 70 feet or to nearest paved roadway.	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles (LAFD)	Pre-Construction	Once, Plan Check (proof of compliance)	Field Inspection Issuance of Applicable Building Permit for Stadium Tower
WFR-PDF-C: During operation of Broadway Junction, Stadium Tower, and Dodger Stadium Station, security monitoring by staff and cameras shall be implemented. Project staff shall be trained to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. Any fire ignited on site shall be promptly reported to LAFD.	Project Operator	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Inclusion of requirement in Emergency Operations Plan Issuance of Certificate of Occupancy

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Section 8.0 | Acronyms

Acronym/Abbreviation	Definition
°F	degrees Fahrenheit
µg/L	Microgram per Liter
µg/m^3	Micrograms per Cubic Meter
3S	Tricable Detachable Gondola System
AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACC	Advanced Clean Cars
ACM	Asbestos Containing Material
ACRES	Assessment, Cleanup, and Redevelopment Exchange System
ADA	Americans with Disabilities Act
ADP	Alameda District Specific Plan
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Air Dispersion Model
Alquist-Priolo Act	Alquist-Priolo Earthquake Fault Zoning Act
ALS	Advanced Life Support
ANSI	American National Standards Institute
APCD	Air Pollution Control District
APE	Area of Potential Effect
API	Area of Potential Impact
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ART	Aerial Rapid Transit
ARTIC	Anaheim Regional Transportation Intermodal Center
ARTT LLC	Aerial Rapid Transit Technologies LLC
ASCE	American Society of Civil Engineers
ATCM	Airborne Toxic Control Measure
AUF	Acoustic Use Factor
AVO	Average Vehicle Occupancy
AVTA	Antelope Valley Transit Authority
BACM	Best Available Dust Control Measures
Basin Plan	Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties
bgs	Below Ground Surface
BMP	Best Management Practice
BRT	Bus Rapid Transit
BSA	Biological Survey Area
BTEX	Benzene, Toluene, Ethylbenzene and Xylene
BTU	British Thermal Unit
C & D	Construction and Demolition

Acronym/Abbreviation	Definition
CA MUTCD	California Manual of Uniform Traffic Control Devices
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality Standard
CAFE	Corporate Average Fuel Economy
Cal EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
CalGEM	California Department of Conservation Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalReycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAM	The Chinese American Museum
CAP	Criteria Air Pollutant
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CASP	Cornfield-Arroyo Seco Specific Plan
CBC	California Building Code
CC&Rs	Covenants, Conditions, Restrictions and Easement for Chavez Ravine
CCAA	California Clean Air Act
CCCC	California Climate Change Center
CCR	California Code of Regulations
cd/m^2	Candelas per Square Meter
CDFW	California Department of Fish and Wildlife
CE	Commuter Express
CEC	California Energy Commission
Central Basin	Central Subbasin
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	Methane
CHL	California Historical Landmarks
CHRIS	California Historical Resources Inventory Systems

Acronym/Abbreviation	Definition
CLA	Chief Legislative Analyst
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_{2e}	CO_2 Equivalents
ColWMP	Countywide Integrated Waste Management Plan
Cortese	Hazardous Waste and Substances Sites
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMMP	Cultural Resources Monitoring and Mitigation Plan
CRPR	California Rare Plant Ranks
CTMP	Construction Traffic Management Plan
CUP	Conditional Use Permit
CUPA	Certified United Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
CY	Cubic Yards
dB	Decibel
dBA	A-Weighted Decibel
DBE	Disadvantaged Business Enterprises
DBH	Diameter at Breast Height
DCA	Department of Cultural Affairs
DEIR	Draft Environmental Impact Report
DGS	Department of General Services
DHS	Department of Health Services
DoD	Department of Defense
DOORS	Diesel Off-Road Online Reporting System
DPM	Diesel Particulate Matter
DPR	California Department of Parks and Recreation
DSE	Dodger Stadium Express
DTLA 2040	Downtown Community Plan
DTSC	Department of Toxic Substances Control
DVBE	Disabled Veteran Business Enterprises (DVBE)
DWR	Department of Water Resources
EDR	Environmental Data Resources, Inc.
EFCs	Equity Focus Communities
EIR	Environmental Impact Report

Acronym/Abbreviation	Definition
EISA	Energy Independence and Security Act
El Pueblo	El Pueblo de Los Angeles
EMD	Emergency Management Department
EMS	Emergency Medical Service
EOB	Emergency Operations Board
EOO	Emergency Operations Organization
EOP	Emergency Operation Plan
EPA	Environmental Protection Agency
ESA	Endangered Species Act (from Biological Resources)
ESA	Environmental Site Assessment (from Hazards and Hazardous Materials)
EV	Electric Vehicle
fc	Footcandles
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FIRMS	Flood Insurance Rate Maps
FMP	Floodplain Management Plan
FPP	Fire Protection Program
ft	Feet
FT	Foothill Transit
FTA	Federal Transit Administration
General Plan	City of Los Angeles General Plan
GHG	Greenhouse Gas
GIS	Geographic Information System
GPA	GPA Consulting
GPD	Gallons per Day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWh	Gigawatt Hours
GWP	Global Warming Potential
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HCD	California Department of Housing and Community Development
HCM	Los Angeles Historic-Cultural Monument
HDM	Highway Design Manual
HEPA	High-Efficiency Particulate Air
HFC	Hydrofluorocarbons
HIC	Non-Cancer Chronic Hazard Index
HIN	High Injury Network

Acronym/Abbreviation	Definition
HMBP	Hazardous Materials Business Plan
HOV	High Occupancy Vehicle
hp	Horsepower
HPOZ	Historic Preservation Overlay Zone
HRA	Health Risk Assessment
HRTR	Historical Resources Technical Report
HSC	Health and Safety Code
HSR	California High-Speed Rail
HVAC	Heating, Venting, and Air Conditioning
Hz	Hertz
I-5	Interstate 5
IEPR	Integrated Energy Policy Report (IEPR)
IES	Illuminating Engineering Society
IFC	The International Fire Code
IGP	Industrial General Permit
IPaC	Information for Planning and Conservation
IRP	Integrated Resource Plan
ISTEA	Intermodal Surface Transportation Efficiency Act
ITS	Intelligent Transportation Systems
Kizh Nation	Gabrieleño Band of Mission Indians – Kizh Nation
KOP	Key Observation Points
kWh	Kilowatt Hours
LA ART LLC	LA Aerial Rapid Transit Technologies LLC
LABOE	Los Angeles Bureau of Engineering
LACDPW	Los Angeles County Department of Public Works
LACDRP	Los Angeles County Department of Regional Planning
LACTMA	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFC	Los Angeles Fire Code
LAFC	Los Angeles Football Club
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAHCM	Los Angeles Historic-Cultural Monument
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARAP	Los Angeles Department of Recreation and Parks
LARIAC	Los Angeles Region Imagery Acquisition Consortium
LARWQCB	Los Angeles Regional Water Quality Control Board

Acronym/Abbreviation	Definition
LASAN	Los Angeles Sanitation & Environment Department
LASD	Los Angeles County Sheriff's Department
LASHP	Los Angeles State Historic Park
LAUS	Los Angeles Union Station
LAUSD	Los Angeles Unified School District
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LBP	Lead-based paints
lbs	Pounds
LCFS	Low Carbon Fuel Standards
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LinkUS	Link Union Station Project
LOS	Level of Service
LOSSAN	Los Angeles-San Diego-San Luis Obispo Rail Corridor
LOTUS	Lotus v. Department of Transportation
LRA	Local Responsibility Area
LRT	Light Rail Transit
LRTP	Long-Range Transportation Plan
LSAA	Lake or Streambed Alteration Agreement
LST	Localized Significance Threshold
LU	Landscape Units
LUST	Leaking Underground Storage Tank
L_v	Vibration Velocity Level
MBS	Moving Beyond Sustainability Plan
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
Metro	Los Angeles County Metropolitan Transportation Authority
MFR	Multi-Family Residential
mg/kg	Milligrams per Kilogram
MGD	Million Gallons per Day
MICR	Maximum Incremental Cancer Risk
MLB	Major League Baseball
MLD	Most Likely Descendant
MM	Mitigation Measure
MMBTu	Million British Thermal Unit
MOA	Mode of Access
MPO	Metropolitan Planning Organization

Acronym/Abbreviation	Definition
MRZ	Mineral Resources Zone
MS4	Municipal Separate Storm Sewer Systems
msl	Mean Sea Level
MT	Metric Tons
MT CO2e/year	Metric Tons of Carbon Dioxide Equivalent Per Year
MTA	Metropolitan Transit Authority
MUTCD	Manual on Uniform Traffic Control Devices
MW	Megawatts
MWD	Metropolitan Water District
MWh	Megawatt Hours
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFPA	National Fire Protection Association
NHM	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NSR	Noise-Sensitive Receptors
O_3	Ozone
OCS	Overhead Contact Lines
OCTA	Orange County Transportation Authority
OEHHA	Office of Environmental Health Hazard Assessment
OHSU	Oregon Health and Science University
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OVA	Organic Vapor Analyzer
Park General Plan	Los Angeles State Historic Park General Plan
Pb	Lead
PDF	Project Design Feature
PFC	Perfluorocarbons
pLAn	Sustainable City Plan

Acronym/Abbreviation	Definition
PM	Particulate Matter
PM_{10}	Respirable Particulate matter
$PM_{2.5}$	Fine Particulate Matter
PPHPD	Passengers Per Hour Per Direction
ppm	Parts per Million
ppmv	Parts per Million by Volume
PPOP	Plans, Programs, Ordinances, or Policies
PPV	Peak Particulate Velocity
PRC	Public Resources Code
PRMMP	Paleontological Resources Monitoring and Mitigation Plan
PUC	Public Utilities Code
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
REC	Recognized Environmental Condition
RIO	Los Angeles River Improvement Overlay
RMS	Root Mean Square
ROG	Reactive Organic Gases
ROW	Right-of-Way
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Los Angeles Regional Water Control Board
SAFE	Safe Affordable Fuel-Efficient
SANBAG	San Bernardino Association of Governments
SARA	Superfund Amendment and Reauthorization Act
SB	Senate Bill
SBE	Small Business Enterprises
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
Scoping Plan	Climate Change Scoping Plan: A Framework for Change
SCRIP	Southern California Regional Interconnector Project
SCRRA	Southern California Regional Rail Authority
SCS	Sustainable Communities Strategy
SCT	Santa Clarita Transit
SEA	Significant Ecological Area
sf	Square Feet
SF_6	Sulfur Hexafluoride
SFR	Single-Family Residential

Acronym/Abbreviation	Definition
SGMA	Sustainable Groundwater Management Act
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SLA	Surplus Land Act
SLF	Sacred Lands File
SLIC	Spills, Leaks, Investigations, and Cleanups
SLTRP	Strategic Long-Term Resource Plan
SMMC	Santa Monica Mountains Conservancy
SO_2	Sulfur Dioxide
SoCalGas	Southern California Gas Company
SOHP	State Office of Historic Preservation
SOP	Standardized Operating Procedures
SO_X	Sulfur Oxides
SP	Special Publication
SPL	Sound Pressure Levels
SR	State Route
SR-110	State Route 110
SRA	State Responsibility Area
SSC	Species of Special Concern
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow Response Plan
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
SUSMP	Standard Urban Stormwater Mitigation Plan
SWITRS	Statewide Integrated Traffic Records System
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TAG	Transportation Assessment Guidelines
TCE	Temporary Construction Easements
TCM	Transportation Control Measures
TCO	Tribal Control Officer
TCR	The Climate Registry
TCR	Tribal Cultural Resource
TDS	Total Dissolved Solid
TIMS	Transportation Injury Mapping System
TNC	Transportation Network Company
TNM	Traffic Noise Model
TPH	Total Petroleum Hydrocarbons
TRB	Transportation Research Board
TSM	Transportation Systems Management

Acronym/Abbreviation	Definition
TVM	Ticket Vending Machines
UCLA	University of California, Los Angeles
UDOT	Utah Department of Transportation
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geological Survey
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program
VCTC	Ventura County Transportation Commission
VdB	Decibel Notation for Vibration Level
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WBE	Women Business Enterprises
WQCMPUR	Water Quality Compliance Master Plan for Urban Runoff
WRD	Water Replenished District of Southern California
WSAB	West Santa Ana Branch Transit corridor
ZET	Zero Emissions Transit
ZEV	Zero Emission Vehicle
ZIMAS	Zoning Information and Map Access System
ZNE	Zero Net Energy

Section 9.0 | List of Preparers

For ease of reference, this section, providing the lead agency and list of preparers for the Final EIR, reincorporates the preparers from Section 8.0, List of Preparers, of the Draft EIR, and includes additions for preparers of the Final EIR.

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9.6 PROJECT SPONSOR

LA Aerial Rapid Transit Technologies LLC

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Section 10.0 | References

SECTION 1.0 EXECUTIVE SUMMARY

32 CFR Section 767.8.

California Code of Regulations, Article 4, Sections 1529, 5208, and 1532.

California Code of Regulations, Section 2485.

California Code of Regulations, Sections 3150 through 3191.

California Geological Survey Special Publication 117 (as amended).

California Public Resources Code (PRC) Section 21083.2(i).

California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

California Streets and Highways Code Section 660.

Civil Code Section 801.

Government Code Section 14666.

Government Code Sections 65864 through 65869.5.

LAMC Section 11.5.7.

LAMC Sections 13.11 and 12.32.S.

LAMC Section 12.24.M.

Los Angeles Charter and Administrative Code, Sec. 13.4. Applicability.

Los Angeles Charter and Administrative Code, Sec. 390. Franchises.

Los Angeles Charter and Administrative Code, Sec. 22.109. Board of Cultural Affairs Commissioners Control over Works of Art.

OSHA 29 CFR Sections 1926.62 and 1926.1101.

Public Resources Code 5002.2.

Public Resources Code Section 5003.17.

Public Utilities Code Section 130252.

Public Utilities Code Section 130521.

SCAQMD Rule 1403.

Secretary of Interior Standards for Archaeology (36 CFR § 61).

Secretary of Interior's Standards for the Treatment of Historic Properties (60 FR 35843).

Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (68 FR 43159).

SECTION 2.0 INTRODUCTION

49 U.S.C. § 5302(7).

Cal. Pub. Res. Code § 21168.6.9(a)(1)(A)-(F).

Senate Bill (SB) 44, effective January 1, 2022.

SECTION 3.0 PROJECT DESCRIPTION

2019 California Green Building Standards Code. 2019. Available at: https://calgreenenergyservices.com/wp/wp-content/uploads/2019_california_green_code.pdf. Accessed November 2023.

American Nat'l Standards Inst., ANSI B77.1-2017 Passenger Ropeways – Aerial Tramways, Aerial Lifts, Surface Lifts, Tows and Conveyors – Safety Standard. On May 5, 2022, ANSI B77.1-2022 was approved and is in publication. The aerial clearance requirements of ANSI B77.1 are unchanged in the revision from 2017 to 2022. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available for purchase at: https://webstore.ansi.org/standards/ansi/ansib772022?source=blog&_gl=1*qi2wyz*_gcl_au*MjEwNDI2MDE2Ny4xNjk1NzY4MTA5.

ANSI/ASHRAE 62.1, recognized standard for ventilation and indoor air quality. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available for purchase at: https://www.ashrae.org/technical-resources/bookstore/standards-62-1-62-2.

British Broadcasting Corporation. 2023. London cable car: Social media helps boost passenger numbers – TfL. Available at: https://www.bbc.com/news/uk-england-london-65080236. Accessed November 2023.

California Office of Environmental Health Hazard Assessment. CalEnviroScreen 4.0 Map. Available at: https://oehha.ca.gov/calenviroscreen/maps-data. Accessed August 2022.

California State Transportation Agency. 2020. Transit and Intercity Rail Capital Program, Fourth Round Selected Project– Project Detail Summary, April 2020. Available at: https://calsta.ca.gov/-/media/calsta-media/documents/2020-tircp-detailed-project-award-summary.pdf. Accessed March 2022.

California Streets and Highways Code, Section 660.

City of Inglewood. Inglewood Transit Connector Project Final Environmental Impact Report. Available at: https://www.cityofinglewood.org/DocumentCenter/View/17236/ITC_FEIR_Feb2022. Accessed November 2023.

City of Los Angeles Department of City Planning. 2023. Downtown Los Angeles Community Plan Update. Available at: https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about. Accessed August 2023.

City of Los Angeles Department of City Planning. 2003. Central City Community Plan, January 2003. Available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city. Accessed March 2022.

City of Los Angeles Department of City Planning. Central City North Community Plan. Available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north. Accessed March 2022.

City of Los Angeles Department of City Planning. 2004. Silver Lake-Echo Park-Elysian Valley Community Plan, August 2004. Available at: https://planning.lacity.org/plans-policies/community-plan-area/silver-lake-echo-parkelysian-valley Accessed August 2022.

City of Los Angeles Department of Recreation and Parks. 2006. Elysian Park Master Plan, June 2006. Available at: https://www.elysianpark.org/the-master-plan. Accessed August 2022.

City of Los Angeles. El Pueblo de Los Angeles Historical Monument, About Us. Available at: https://elpueblo.lacity.org/about-us. Accessed March 2022.

City of Los Angeles. El Pueblo de Los Angeles Historical Monument, History. Available at: https://elpueblo.lacity.org/history-el-pueblo. Accessed March 2022.

Civil Code Section 801.

Communication with Cesar Dockweiler who is responsible for design, implementation and operation of Mi Teleférico in La Paz, April 10, 2020.

Dale, Steven, et al. Cable Car Confidential: The Essential Guide to Cable Cars, Urban Gondolas & Cable Propelled Transit. Creative Urban Projects, 2013. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available for purchase at: https://www.gondolaproject.com/cable-car-confidential/.

Doppelmayr Garaventa Group. 2020. 10-MGD Emirates Air Line. Available at: https://www.doppelmayr.com/ko/%EC%A0%9C%ED%92%88/references/10-mgd-emirates-air-line/. Accessed November 2023.

Doppelmayr Garaventa Group. 35-TGD BUGA Koblenz. Available at: https://www.doppelmayr.com/de/systeme/referenzen/35-tgd-buga-koblenz/. Accessed November 2023.

Doppelmayr Garaventa Group. 2010. 3S Installation BUGA Koblenz 2011. Available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/3s-installation-buga-koblenz-2011/. Accessed November 2023.

Doppelmayr Garaventa Group. 2019. Doppelmayr completes the world's biggest urban ropeway network. Available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/doppelmayr-completes-the-world-news/. Accessed November 2023.

Doppelmayr Garaventa Group. 2018. Doppelmayr opens the world's longest ropeway. Available at: https://newsroom.doppelmayr.com/en/doppelmayr/press/doppelmayr-opens-the-world/. Accessed November 2023.

Doppelmayr Garaventa Group. 2018. First trip on the Línea Celeste Section 1 and Línea Blanca. Available at: https://newsroom.doppelmayr.com/en/doppelmayr/news/first-trip-on-the-l%C3%ADnea-celeste-section-1-and-l%C3%ADnea-blanca/. Accessed November 2023.

Doppelmayr Garaventa Group. Doppelmayr wins next contract in Mexico City. Available at: https://www.doppelmayr.com/en/news-en/cablebus_linea_3/. Accessed November 2023.

Doppelmayr Garaventa Group. Mexico City celebrates its urban Doppelmayr ropeway. Available at: https://www.doppelmayr.com/en/press/gondelbahn-cablebus-mexico-city/. Accessed November 2023.

ESPN.com. 2019. MLB Attendance Report – 2019. Available at: http://www.espn.com/mlb/attendance/_/year/2019. Accessed March 2022.

Government Code Section 14666.

Government Code Sections 65864 through 65869.5.

Intertraffic. 2019. Speeding up the Mobility Transition: Victor Jasso Interview (Mexicable). Available at: https://www.intertraffic.com/news/infrastructure/speeding-up-in-mobility-victor-jasso-mexicable/. Accessed November 2023.

Intuit.com. Intuit Dome. Available at: https://www.intuit.com/intuitdome/. Accessed November 2023.

LAMC Section 11.5.7.

LAMC Section 12.24.M.

LAMC Sections 13.11 and 12.32.S.

Los Angeles Charter and Administrative Code, Sec. 13.4. Applicability.

Los Angeles Charter and Administrative Code, Sec. 22.109. Board of Cultural Affairs Commissioners Control over Works of Art.

Los Angeles Charter and Administrative Code, Sec. 390. Franchises.

Los Angeles County Metropolitan Transportation Authority. Crenshaw/LAX Transit Project. Available at: https://www.metro.net/projects/crenshaw_corridor/. Accessed March 2022.

Los Angeles County Metropolitan Transportation Authority. 2018. Los Angeles Union Station Forecourt and Esplanade Improvements Project Final Environmental Impact Report. Available at: https://www.dropbox.com/sh/55np14p60s3tch0/AABwyW69bkwUScao1ov2-kD2a/Environment%20Documents?dl=0&subfolder_nav_tracking=1. Accessed March 2022.

Los Angeles County Metropolitan Transportation Authority. Los Angeles Union Station Master Plan. This document is no longer available online. The Transforming Los Angeles Union Station summary is

available at: http://libraryarchives.metro.net/DPGTL/unionstation/2015-transforming-los-angeles-union-station-summary-report.pdf. Accessed November 2023.

Major League Baseball. Dodger Stadium History. Available at: https://www.mlb.com/dodgers/ballpark/information/history. Accessed March 2022.

Mi Teleférico. 2021. Trans-Americas Journey. Available at: https://trans-americas.com/mi-teleferico-cable-cars-la-paz-bolivia/. Accessed November 2023.

Nunez, Lorenzo. 2021. Cablebus Lines 1 and 2 to Begin Operating in July. Available at: https://mexicobusiness.news/infrastructure/news/cablebus-lines-1-and-2-begin-operating-july. Accessed November 2023.

OHSU News. 2017. Portland Aerial Tram Turns 10. Available at: https://news.ohsu.edu/2017/01/28/portland-aerial-tram-turns-10. Accessed November 2023.

Personal communication with Mr. Frederic Demoulin, Urban Ropeways Project Manager, Leitner-Poma of America, Inc., on August 12, 2022.

POMA. 2010. Aerial Tramway – Airtram Roosevelt Island. Available at: https://www.poma.net/en/work/airtram-roosevelt-island/. Accessed November 2023.

POMA. 3S Aerial Tramway – TELEO. Available at: https://www.poma.net/en/work/teleo/. Accessed November 2023.

Portland Aerial Tram. Learn More. Available at: http://www.gobytram.com/about. Accessed November 2023.

Public Resources Code Section 5002.2.

Public Resources Code Section 5003.

Public Resources Code Section 5003.17.

Public Utilities Code Sections 130521-130252.

Roosevelt Island Operating Corporation. Aerial Tramway Vital Statistics. Available at: https://rioc.ny.gov/173/Aerial-Tramway-Vital-Statistics. Accessed November 2023.

Roosevelt Island Operating Corporation. History. Available at: https://rioc.ny.gov/169/History. Accessed November 2023.

Segura, Edgar. 2023. Así es la nueva Línea 2 del Mexicable: De Ecatepec a Indios Verdes en 29 minutos. Available at: https://www.chilango.com/ciudadania/otros-ciudadania/linea-2-mexicable-ecatepec-ndios-verdes-horario-precio-estaciones/. Accessed August 2023.

Sistema de Transporte Masivo y Teleférico. Mexicable Línea 2: "Indios Verdes - Hank González" (En Construcción). Available at: https://masivoedomex.blogspot.com/2020/07/mexicable-linea-2.html. Accessed November 2023.

Southern California Association of Governments. 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, or "Connect SoCal." available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed August 2022.

Staten Island NY Local News. 2015. Staten Island Tram would require new technology to make trips to Manhattan. Available at: https://www.silive.com/news/2015/06/staten_island_tram_would_requi.html. Accessed November 2023.

The Gondola Project. 2017. System Dossier: Mexicable. Available at: https://www.gondolaproject.com/2017/07/07/system-dossier-mexicable/. Accessed August 2023.

The Institute for Sustainable Infrastructure. Envision Rating System. Available at: https://sustainableinfrastructure.org/envision/use-envision/. Accessed November 2023.

Title 8, California Code of Regulations, Sections 3150 through 3191.

Title 24, California Code of Regulations, residential ventilation requirements standards.

United States Green Building Council Leadership in Energy and Environmental Design for New Construction v4.1. Available at: https://www.usgbc.org/leed/v41. Accessed November 2023.

SECTION 4.0 COSTS AND FINANCING

No reference materials.

SECTION 5.0 CORRECTIONS AND ADDITIONS

29 CFR Section 1926.62, 1926.1101.

36 CFR Part 61.

36 CFR Part 68.

California Code of Regulations Article 4 Sections 1529, 5208, and 1532.

California Code of Regulations Title 14 Section 4306.

California Government Code Sections 65000-66499.58.

City of Los Angeles Department of City Planning. 2023. Downtown Los Angeles Community Plan Update. Available at: https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update. Accessed September 2023.

City of Los Angeles Department of City Planning. 2023. CPC-2023-2306-GPA-VZC-HD-MCUP-SPR. Available at: https://planning.lacity.org/pdiscaseinfo/search/encoded/MjY2MjM10. Accessed September 2023.

City of Los Angeles. 2023. Task Order Solicitation (TOS) No. 94 for the El Pueblo Master Plan (Work Order No. E1909106).

Grimshaw. 2023. Grimshaw to transform LA Chinatown parking lot into all-electric mass timber office building. Available at: https://grimshaw.global/assets/uploads/130_West_College_Street_Grimshaw_Press_Release_1.pdf. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Metro Board of Directors, Zero-Emission Bus Program Update Board Report.

Los Angeles County Metropolitan Transportation Authority. 2023. Free rides across the Metro system this weekend to celebrate the debut of the new A and E Lines, 3 new stations and the opening of the Regional Connector. Available at: https://thesource.metro.net/2023/06/13/free-rides-across-the-metro-system-this-weekend-to-celebrate-the-debut-of-the-new-a-and-e-lines-3-new-stations-and-the-opening-of-the-regional-connector/. Accessed September 2023.

Sharp, Steven. 2023. Five-story office building planned at 130 W College Street in Chinatown. Available at: https://la.urbanize.city/post/five-story-office-building-planned-130-w-college-street-chinatown. Accessed September 2023.

Tal, Gil, Handy, Susan, and Boarnet, Marlon G. 2013. Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature.

The California Endowment. 2023. Annual Report 2023. Available at: https://www.calendow.org/annual-report/. Accessed September 2023.

Topographic-map.com. 2023. Los Angeles topographic map. Available at: https://en-gb.topographic-map.com/. Accessed June 2023.

SECTION 6.0 RESPONSE TO COMMENTS

Acoustical Engineering Services (AES). 2023. Noise Calculation Worksheets, Urban Canyon Effects Calculations.

Administration of Governor Gavin Newsom. 2022. Pathways to 30x30 California. Available at: https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf. Accessed July 2023.

AECOM. 2023. Memo documenting AECOM's inquiry into public hearing translator comments.

American Association of State Highway and Transportation Officials (AASHTO). 2018. A Policy on Geometric Design of Highways and Streets. Available at: https://store.transportation.org/Common/DownloadContentFiles?id=1776. Accessed August 2023.

American National Standards Institute, ANSI B77.1-2017 Passenger Ropeways – Aerial Tramways, Aerial Lifts, Surface Lifts, Tows and Conveyors – Safety Standard. On May 5, 2022, ANSI B77.1-2022 was approved and is in publication. The aerial clearance requirements of ANSI B77.1 are unchanged in the revision from 2017 to 2022. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available for purchase at: https://webstore.ansi.org/standards/ansi/ansib772022?source=blog&_gl=1*qi2wyz*_gcl_au*MjEwNDI2MDE2Ny4xNjk1NzY4MTA5.

American National Standards Institute (ANSI). 2022. ANSI B77.1-2022, 3.3.2.5.7. Evacuation. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available for purchase at: https://webstore.ansi.org/standards/ansi/ansib772022?source=blog&_gl=1*qi2wyz*_gcl_au*MjEwNDI2MDE2Ny4xNjk1NzY4MTA5.

American Planning Association (APA). 2015. Olvera Street Great Places. Available at: https://www.planning.org/greatplaces/streets/2015/olverastreet.htm. Accessed August 2023.

American Planning Association (APA). 2023. Great Places In America. Available at: https://www.planning.org/greatplaces/. Accessed August 2023.

Axios. 2023. Medellín and the Power of Public Transportation. Available at: https://www.axios.com/2023/02/07/medellin-mass-transit. Accessed September 2023.

Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184.

Banff Adventures. 2016. Reaching to the Sky - The Historic Banff Gondola. Available at: https://www.banffadventures.com/News/ArtMID/461/ArticleID/37/Reaching-to-the-Sky-The-Historic-Banff-Gondola. Accessed June 2023.

Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs (2001) 91 Cal.App.4th 1344.

California Air Pollution Control Officers Association (CAPCOA). 2021. CalEEMod® Appendix A: Calculation Details for CalEEMod®. Available at: http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6. Accessed: August 2023.

California Air Pollution Control Officers Association (CAPCOA). 2021. CalEEMod® User Guide Version 2020.4.0. Available at: http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/01_user-39-s-guide2020-4-0.pdf?sfvrsn=6. Accessed: August 2023.

California Civil Code Section 801.

California Code of Civil Procedure Section 1240.110.

California Code of Regulations, Title 14, Section 753.5.

California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Data Base (CNDDB). Full report for Los Angeles, Burbank, Pasadena, Mt. Wilson, Hollywood, El Monte, Inglewood, South Gate, and Whittier quadrangles. Generated May 10, 2022. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten.

California Department of Fish and Wildlife (CDFW). 2023. California Natural Diversity Database (CNDDB). Available at: https://wildlife.ca.gov/Data/CNDDB. Accessed August 2023.

California Department of Housing and Community Development. 2021. Surplus Land Act Guidelines. Available at: https://www.hcd.ca.gov/community-development/docs/sla_guidelines_final.pdf. Accessed August 2023.

California Department of Parks and Recreation. 2023. California State Parks Listing. Available at: https://www.parks.ca.gov/?page_id=21805. Accessed July 2023.

California Department of Transportation (Caltrans). 2013. Section 4.4.1.6 Tolerances. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed August 2023.

California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol Section 2.1.4.4. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed August 2023.

California Department of Transportation (Caltrans). 2014. California Manual of Uniform Traffic Control Devices (CA MUTCD), Revision 7. Available at: https://dot.ca.gov/programs/safety-programs/camutcd. Accessed August 2023.

California Department of Transportation (Caltrans). 2020. Highway Design Manual, 7th Edition. Available at: https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm. Accessed August 2023.

California Fish and Game Code Section 711.4.

California Government Code Section 54220, et seq.

California Government Code Section 14666.

California Government Code Section 11005.2.

California Government Code Sections 65000-66499.58.

California Labor Code Section 7341.

California Natural Resources Agency (CNRA). 2022. Pathways to 30x30 California. Available at: https://www.californianature.ca.gov/pages/30x30. Accessed August 2023.

California Natural Resources Agency (CNRA). 2009. Final Statement of Reasons for Regulatory Action. Available at: https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf. Accessed August 2023.

California Office of Environmental Health Hazard Assessment. 2020. CalEnviroScreen 4.0 Maps. Available at: https://oehha.ca.gov/calenviroscreen/maps-data. Accessed September 2023.

California Office of Planning and Research (OPR). California Environmental Quality Act (CEQA) Guidelines. 2023. Available at: https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf. Accessed August 2023.

California Public Resources Code Section 5001.

California Public Resources Code. Section 5001.2.

California Public Resources Code Section 5002.

California Public Resources Code Section 5003.

California Public Resources Code. Section 5003.5.

California Public Resources Code Section 5003.17.

California Public Resources Code Section 5012.

California Public Resources Code Section 5019.

California Public Resources Code Section 5019.53.

California Public Resources Code Section 5019.59.

California Public Resources Code Section 21001.

California Public Resources Code Section 21002.

California Public Resources Code Section 21061.

California Public Resources Code Section 21069.

California Public Resources Code Section 21081.

California Public Resources Code Section 21089.

California Public Resources Code Section 21092.1.

California Public Resources Code Section 21100.

California Public Resources Code Section 21104.

California Public Resources Code Section 21153(c).

California Public Resources Code Section 21168.6.9.

California Public Resources Code Section 21174.

California Public Resources Code Section 30001.

California Public Utilities Code Section 130000.

California Public Utilities Code Sections 130050 and 130051.

California Public Utilities Code Section 130105(f).

California Public Utilities Code Section 130252.

California Public Utilities Code Section 130521.

California Public Utilities Code Section 180152.

California Public Utilities Code Sections 30503, 130220.5(a).

California Public Utilities Code Section 30600.

California State Department of Parks and Recreation 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf. Accessed September 2023.

California v. Ciraolo (1986) 476 U.S. 207.

Center for Biological Diversity v. County of San Bernardino (2010) 185 Cal.App.4th 866.

Cerda, et al. 2012. Reducing Violence by Transforming Neighborhoods: a Natural Experiment in Medellín, Colombia. Available at: https://pubmed.ncbi.nlm.nih.gov/22472117/. Accessed September 2023.

36 CFR Part 800.

City of Burnaby. 2019. Burnaby Mountain Gondola Transit Project. Available at: https://pub-burnaby.escribemeetings.com/filestream.ashx?DocumentId=43307. Accessed August 2023.

City of Los Angeles. 2000. Central City North Community Plan. Available at: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north. Accessed: March 2022.

City of Los Angeles. 2001 General Plan Framework Element. Available at: https://planning.lacity.org/plans-policies/framework-element. Accessed: August 2023.

City of Los Angeles. 2005. South Airfield Improvement Project Project-Level Tiered Draft Environmental Impact Report (DEIR). Available at: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/south-airfield-improvement-project. Accessed August 2023.

City of Los Angeles. 2006. CEQA Thresholds Guide. Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf. Accessed August 2023.

City of Los Angeles. 2008. Dodger Stadium: The Next 50 Years, Notice of Preparation. Available at: https://planning.lacity.org/eir/nops/ENV-2008-1659.pdf. Accessed August 2023.

City of Los Angeles. 2015. Sewer System Management Plan. Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M216.pdf. Accessed August 2023.

City of Los Angeles. 2019 Dodger Stadium Centerfield Project. Available at https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=19-1096. Accessed August 2023.

City of Los Angeles. 2019. Inter-Departmental Correspondence – Transmittal – Recommendations for the Proposed Transfer of 901 and 903 Main Street, Los Angeles, CA 90012. Available at: https://clkrep.lacity.org/onlinedocs/2018/18-0930_rpt_CAO_03-29-2019.pdf#page=3. Accessed September 2023.

City of Los Angeles. 2023. Commission, El Pueblo de Los Angeles Historical Monument. Available at: https://elpueblo.lacity.gov/commission. Accessed July 2023.

City of Los Angeles. 2023. ZIMAS. Available at: https://zimas.lacity.org/. Accessed August 2023.

City of Los Angeles. ZIMAS User Guide. Available at: http://zimas.lacity.org/webhelp/pdf/ZimasUserGuide.pdf. Accessed September 2023.

City of Los Angeles Department of City Planning Office of Zoning Administrator. 1960. Z.A. Case No. 15430. Dodger Baseball Stadium Site – Chavez Ravine Area (Dodger Stadium Conditional Use Permit).

CNBC. 2018. How Cable Cars are Revolutionizing Public Transport Almost 12,000 Feet Above Sea Level. Available at: https://www.cnbc.com/2018/12/07/how-cable-car-systems-are-revolutionizing-public-transport-in-la-paz.html. Accessed September 2023.

Continuing Education of the Bar. Practice Under the California Environmental Quality Act, Section 12.34. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten. Available at: https://search.library.ucla.edu/permalink/01UCS_LAL/17p22dp/alma9960180853606533.

Corey, Richard. 2018. Potrero Power Plant. Available at: http://docs.ppsmixeduse.com/ppp/AB_900/2018_0831_carb_ab900-determination.pdf. Accessed September 2023.

Cornfield State Park Advisory Committee. 2003. Recommendations Report. Available at: https://www.parks.ca.gov/pages/21491/files/RecommendationsReport.pdf. Accessed August 2023.

Dale, Steven. 2017. The Koblenz Rheinseilbahn, Part 1: Introduction. Available at: https://www.gondolaproject.com/2010/09/13/the-koblenz-rheinseilbahn-part-1-introduction/. Accessed August 2023.

Del Valle, George. Principal Transportation Planner Metro Contract Services. 2022. Personal Communication.

Dobson, Martin & Jo Ryan. 2000. Trees & Shrubs for Noise Control. Available at: https://www.trees.org.uk/Trees.org.uk/files/8c/8c69f212-a82e-424b-96d1-c8ff6dc02403.pdf. Accessed March 2023.

Dodger Blue. 2019. Dodgers Break Franchise Record for Dodger Stadium Attendance. Available at: https://dodgerblue.com/dodgers-franchise-record-dodger-stadium-attendance/2019/09/23/. Accessed August 2023.

Dodger Blue. 2022. Dodgers Attendance During 2022 Extended MLB Leading Streak. Available at: https://dodgerblue.com/dodgers-attendance-during-2022-season-extended-mlb-leading-streak/2022/10/07/. Accessed August 2023.

Doppelmayr. 2019. Noise Measurements Bottom Station and Tower for 3K K-onnection Kaprun.

Doppelmayr/Garaventa. 2023. Utilization: Linea Morada Section 1. Personal Communication.

Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20.

ESRI. 2023. USGS Protected Areas Database of the United States. https://www.arcgis.com/home/item.html?id=e20f27c6af5a49b289bea1ba05b4986b. Accessed July 2023.

Eyestone Environmental. 2016. Crossroads Hollywood Project. Available at: https://planning.lacity.org/eir/CrossroadsHwd/Deir/Deir_EX/AgencyCorrespondence/Files/2016.11.18%200201pm%20-%20FW_%20ARB%20Determination%20AB%20900.pdf. Accessed August 2023.

Federal Highway Administration (FHWA). 2015. Guidelines for the Visual Impact Assessment of Highway Projects. Available at: https://www.environment.fhwa.dot.gov/env_topics/other_topics/VIA_Guidelines_for_Highway_Projects.pdf. Accessed August 2023.

Federal Highway Administration (FHWA). 2017. Noise Fundamentals. Available at: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm. Accessed August 2023.

Federal Register. 1994. Executive Order 12898. Available at: https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf. Accessed August 2023.

Federal Transit Administration (FTA). 2004. FTA Fiscal Year 2005 Apportionments, Allocations and Program Information. Available at: https://www.govinfo.gov/content/pkg/FR-2004-12-29/pdf/04-28408.pdf. Accessed August 2023.

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed August 2023.

Federal Transit Administration (FTA). Section 5309 Grant Program. Available at: https://www.transit.dot.gov/capital-investment-grants-5309. Accessed August 2023.

Fehr & Peers. 2022. Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment.

Fehr & Peers. 2022. Los Angeles Aerial Rapid Transit Project, Parking Study.

Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

Florida v. Riley (1989) 488 U.S. 445.

Garcia, Sid. 2014. Metro buses get multi-camera video surveillance systems. Available at: https://abc7.com/metro-bus-video-recording-camera-system-surveillance-cameras/143396/. Accessed September 2023.

Gobytram. Portland Aerial Tram – Learn More. Available at: http://www.gobytram.com/about. Accessed September 2023.

Google Translate. Available at: https://translate.google.com/?sl=auto&tl=en&text=les%20op%C3%A9rateurs%20d%E2%80%99Altiservice%2C%20l%E2%80%99exploitant%20de%20T%C3%A9l%C3%A9o%2C%20ont%20notamment%20v%C3%A9rifi%C3%A9%20les%20cavaliers%2C%20ces%20pi%C3%A8ces%20m%C3%A9talliques%20qui%20maintiennent%20l%E2%80%99%C3%A9cartement%20entre%20les%20c%C3%A2bles&op=translate. Accessed September 2023.

Golden Door Properties, LLC v. County of San Diego (2020) Cal.App.5th 467.

Gric, R. & Nejez, J. 2017. The 3S Gondola Lift Is 25 Years Old. Available at: https://en.isr.at/singleview-en-old/article/the-3s-gondola-lift-is-25-years-old. Accessed August 2023.

Gruen Associates. 1990. Dodger Stadium Transit Access Study. Available at: https://libraryarchives.metro.net/dpgtl/lactc/dodger_stadium_access_study.pdf. Accessed August 2023.

He, Brian Yueshuai. Selected Publications. Available at: https://www.brianyueshuaihe.com/publications. Accessed August 2023.

Hilda L. Solis. 2021. Revised Restorative Justice Village Master Plan. Available at: https://file.lacounty.gov/SDSInter/bos/supdocs/153341.pdf. Accessed March 2023.

Homeboy Industries. 2022. Hope Village. Available at: https://homeboyindustries.org/hiltonfoundation/initiatives/. Accessed August 2023.

Hymon, Steve. 2018. Metro and ARTT co-sign Letter of Intent to begin negotiations on developing gondola to Dodger Stadium. Available at: https://thesource.metro.net/2018/12/06/metro-and-artt-co-sign-letter-of-intent-to-begin-negotiations-on-developing-gondola-to-dodger-stadium/#:~:text=Metro%20announced%20on%20Thursday%20that,to%20Dodgers%20Stadium%20a%20reality. Accessed August 2023.

Hymon, Steve. 2018. Metro receives Unsolicited Proposal for aerial rapid transit between Union Station and Dodger Stadium. Available at: https://thesource.metro.net/2018/04/26/metro-receives-unsolicited-proposal-for-aerial-rapid-transit-between-union-station-and-dodger-stadium/. Accessed August 2023.

Institute for Sustainable Infrastructure. 2023. Envision Rating System of the Institute for Sustainable Infrastructure. Available at: https://sustainableinfrastructure.org/envision/use-envision/. Accessed August 2023.

International Finance Corporation (IFC). 2020. A Cable Car Named Development. Available at: https://www.ifc.org/wps/wcm/connect/news_ext_content/ifc_external_corporate_site/news+and+events/news/cm-stories/bogota-cable-car. Accessed September 2023.

Katz v. United States (1967) 389 U.S. 347.

KFA Architecture. 2023. Homeboy Industries Campus. Available at: https://kfalosangeles.com/project/homeboy-industries-campus/. Accessed September 2023.

LA Aerial Rapid Transit Technologies LLC. 2023. Memorandum Regarding LA ART Draft EIR Public Hearing No. 3 – Consultant Experiences During Protest.

Laurel Heights Improvement Assn. v. Regents of the University of California (1993) 6 Cal.4th 1112.

Leitner. 2021. Cablebus 2 Gondola Lift in Mexico City Now Ready for Operation. Available at: https://www.leitner.com/en/company/news/detail/cablebus-2-gondola-lift-in-mexico-city-now-ready-for-operation. Accessed September 2023.

Leitner. 2023. Mexico: A New Chapter in the Ropeway Success Story. Available at: https://www.leitner.com/en/company/news/detail/mexico-a-new-chapter-in-the-ropeway-success-story/. Accessed September 2023.

Los Angeles Aerial Rapid Transit. 2021. Los Angeles Aerial Rapid Transit Announces Proposed Community Access Program for Urban Gondola from Union Station to Dodger Stadium. Available at: https://www.dropbox.com/s/x9hk62cd6g5fcd9/Community%20Fares%20Release.pdf?dl=0. Accessed August 2023.

Los Angeles Aerial Rapid Transit. 2022. Draft EIR Informational Workshop Boards (All Languages).

Los Angeles Aerial Rapid Transit. 2022. LA ART Informational Workshop Slides – 10/22 (available in English, Spanish, Chinese-Simplified, Chinese-Traditional).

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Partnerships and Unsolicited Proposals. Available at: https://www.metro.net/about/partnerships-ups/. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Unsolicited Proposal Policy FAQS. Available at: https://uc46a024b217fbfe02a5f24938a2.dl.dropboxusercontent.com/cd/0/inline2/CGvGq5mY4NF3Cx-KEZc1RjAOBc11h_RS6ApDZStiNMv7l9mEJjBQ4ARqJHt2hwif-Iy7KsAMQQidpxi4IgYtvaOhytPQphuMGBvwl87STcPr-erWYAr3mncq4ZW6DEMMu7ij1sBOmwte9iYCd4LhPEudpRLoT-sfdVPo7bsi5vAC9oMJmT_jVs-5yJzaMqnVNaZnbvoAOUr7OnqQMWY4Ic8EMNJ43P4DtXUPuv5WOQ544t30zf3S9PMigsRyEOHXU7jd-MO-ehWbas9mm51Cr92e1zFKSRwNsnzHTX39XpJWEi6ZRZxt8A3FaCaPySND2dNVJWad7gfvUT-YS7ENBnWhcNE796gj0vPJp8Py6YQn5-ZlekyvjZyycgy2TGAjLg4/file. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). December 3, 2018 Board Box Update.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - December 6, 2018 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/987?view_id=2&redirect=true&h=7b1d4fe0fe92c06e7a30b6c30ed61f65. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - April 18, 2019 Metro Executive Management Committee meeting recording. Available at: https://metro.granicus.com/player/clip/1091?view_id=2&redirect=true&h=e0352c04502d95aea37f5a74c40c717a. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - April 25, 2019 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/1099?view_id=2&redirect=true&h=5ebfcc7e9787667a4cbe355e03c58af1. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - September 17, 2020 Metro Executive Management Committee meeting recording. Available at: https://metro.granicus.com/player/clip/1525?view_id=2&redirect=true&h=9ebfa1ab280794b112e1eb413ff7df27. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - September 24, 2020 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/1537?view_id=2&redirect=true&h=07f669d762b7a17f8a7c2791cea2c473. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - June 17, 2021 2020 Metro Executive Management Committee meeting recording. Available at: https://metro.granicus.com/player/clip/1854?view_id=2&redirect=true&h=5efbda9e4a22cf19e8a883ea3ab9c207. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - June 24, 2021 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/1868?view_id=2&redirect=true&h=4ef94c7f1b5274980b58496e97b14f50. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings – November 16, 2022 Metro Ad Hoc 2028 Olympics Committee meeting. Available at: https://metro.granicus.com/player/clip/2413?view_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2010. Records Management Policy.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Communications – Metro System Advertising.

Los Angeles County Metropolitan Transportation Authority. Los Angeles Union Station Master Plan. document is no longer available online. The Transforming Los Angeles Union Station summary is available at: http://libraryarchives.metro.net/DPGTL/unionstation/2015-transforming-los-angeles-union-station-summary-report.pdf. Accessed November 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2021. Metro Adjacent Development Handbook. Available at: https://www.dropbox.com/s/3cddvf2og5jo5v6/2021-Adjacent-Development-Review-Handbook.pdf?dl=0. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2018. Metro Design Criteria and Standards Adjacent Construction Design Manual. Available at: https://www.dropbox.com/s/c02lklxuvphbah1/2018-Adjacent-Construction-Design-Manual.pdf?dl=0. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2018. Regular Board Meeting Agenda Item 4. Available at: https://metro.granicus.com/player/clip/987?view_id=2&redirect=true&h=7b1d4fe0fe92c06e7a30b6c30ed61f65. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Gentrification and Displacement. Available at: https://www.metro.net/about/gentrification-displacement/. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Advertising, Sponsorships & Filming. Available at: https://www.metro.net/about/advertising-sponsorships-filming/. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. Ad Hoc 2028 Olympics Committee. Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2020. 2020 Long Range Transportation Plan. Available at: https://www.metro.net/about/plans/long-range-transportation-plan/. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2021. Metro Final Report: MSRC Contract MS21001 Dodger Stadium Express 2019 Season. Available at http://www.cleantransportationfunding.org/sites/default/files/projects-final-reports-2020-04/MS21001_Metro_Dodgers_Final_Report.pdf. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings - April 26, 2018 Metro Board of Directors meeting recording. Available at: https://metro.granicus.com/player/clip/835?view_id=2&redirect=true&h=6b017d810a04fe8d9fad7ce14cfa7a1f. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2020. NexGen Bus Plan. Available at: https://www.metro.net/about/plans/nextgen-bus-plan/. Accessed: September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2020. Public Transportation Agency Safety Plan. Available at: https://libraryarchives.metro.net/DB_Attachments/200401_Attachment%20B%20-%20PTASP.pdf. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Metro Board Report Zero Emission Bus Program Update. Available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf. Accessed August 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. First/Last Mile. Available at: https://www.metro.net/about/first-last/. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. LA River Path Project. Available at: https://www.metro.net/projects/lariverpath/. Accessed September 2023.

Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. Rapid Equity Assessment. Available at:

https://www.dropbox.com/s/790jw2sumk42ra6/Rapid%20Equity%20Assessment%20Tool.pdf?dl=0. Accessed September 2023.

Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf#page=14. Accessed September 2023.

Los Angeles Department of Transportation. 2020. Transportation Assessment Guidelines (TAG). Available at: https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf. Accessed August 2023.

Los Angeles Department of Transportation. 2022. Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium.

Los Angeles Dodgers. 2019. Dodger Stadium Express Rider Counts. Please note that this material is either covered under a NDA, otherwise confidential, and/or copywritten.

Los Angeles Dodgers. 2022. Car Service and Taxi. Available at: https://www.mlb.com/dodgers/ballpark/transportation/car-service-and-taxi. Accessed August 2023.

Los Angeles Municipal Code Section 11.5.7.

Los Angeles Municipal Code Section 12.05.

Los Angeles Municipal Code Section 12.24.

Los Angeles Municipal Code Section 14.4.4.

Los Angeles Municipal Code Section 93.0117.

Los Angeles Municipal Code Section 111.00.

Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645.

Map Collaborator. 2023. California Protected Areas Database. Available at: https://www.mapcollaborator.org/cpad/?base=map&y=34.02154&x=-118.41176&z=10&layers=notes%2Cpolygons%2Cuploads&opacs=100%2C25%2C90. Accessed July 2023.

Map Collaborator. 2023. California Conservation Easement Database. Available at: https://www.mapcollaborator.org/cpad/?base=map&y=37.51844&x=-123.95874&z=6&layers=notes%2Ccced&opacs=100%2C100. Accessed September 2023.

Matsuyuki, et al. 2020. Impact of Aerial Cable Car in Low-Income Area in Medellín, Colombia. Available at: https://www.sciencedirect.com/science/article/pii/S2352146520305676. Accessed September 2023.

Mexico News Daily. 2022. Passenger numbers on Mexico City Cablebus line 78% more than expected Available at: https://mexiconewsdaily.com/news/passenger-numbers-on-mexico-city-cablebus-line-78-more-than-expected/. Accessed September 2023.

My Beautiful Passport. 2022. Telecabine Lisboa: Portugal's Cable Car & Gondola Lift. Available at: https://mybeautifulpassport.com/telecabine-lisboa-cable-car-portugal/#:~:text=Opening%20in%20the%20spring%20of,the%20river%20and%20modern%20architecture. Accessed June 2023.

National Ski Areas Association (NSAA). 2016. NSAA Ski Lift Safety Fact Sheet. Available at: https://www.missionridge.com/sites/default/files/NSAA%20Lift%20Safety%20Fact%20Sheet%2001.2012.pdf. Accessed August 2023.

NZ Transport Agency. Assessment of Environmental Effects for the Basin Bridge Project, Wellington Northern Corridor RoNS. Available at https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000026/Applicants-proposal-documents/5f29d30124/AEE-Chapter-16.pdf. Accessed August 2023.

Ober Mountain. 2023. Aerial Tramway. Available at: https://obergatlinburg.com/aerial-tramway/. Accessed June 2023.

Occupational Safety and Health Administration (OSHA). 2008. Standard 1910.95 Occupational Noise Exposure. Available at: https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.95. Accessed August 2023.

Occupational Safety and Health Administration (OSHA). Standard 5096 Exposure Limits for Noise. Available at: https://www.dir.ca.gov/title8/5096.html. Accessed August 2023.

Otis, John. 2014. High in the Andes, Bolivia's Gondolas in the Sky Ease Congestion. Available at: https://www.npr.org/sections/parallels/2014/10/22/358046982/high-in-the-andes-bolivias-gondolas-in-the-sky-ease-congestion. Accessed August 2023.

Palm Springs Aerial Tramway. 2022. History. Available at: https://pstramway.com/about-us/history/. Accessed June 2023.

ParCitypatory. 2019. Connecting the Outskirts to City Centre with Cable Cars. Available at: https://parcitypatory.org/2019/06/08/mexicable/. Accessed September 2023.

Périé, Paul. 2022. À Toulouse, une maintenance spectaculaire pour le téléphérique Téléo. Available at: https://www.leparisien.fr/haute-garonne-31/a-toulouse-une-maintenance-spectaculaire-pour-le-telepherique-teleo-10-08-2022-EOFH5CXWIBDSDEG6FP6KSK5XJE.php. Accessed August 2023.

Pilatus. 2023. Aerial Cableway Dragon Ride Facts. Available at: https://www.pilatus.ch/en/discover/aerial-cableway/aerial-cableway-dragon-ride. Accessed June 2023.

Planning and Conservation League v. Department of Water Resources (2000) 83 Cal.App.4th 892.

Poma. 2021. More About the Project. Available at: https://www.poma.net/en/work/teleo/. Accessed August 2023.

Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th 1099.

Quintana, Francisco. 2022. Assemblywoman Wendy Carrillo Announces $5 Million in California State Budget Funds for Hope Village Project. Available at: https://a52.asmdc.org/press-

releases/20221101-assemblywoman-wendy-carrillo-announces-5-million-california-state-budget. Accessed August 2023.

Ramboll. 2018. Portrero Power Plant Mixed-Use development GHG Emissions Methodology and Documentation. Available at: http://docs.ppsmixeduse.com/ppp/AB_900/2018_0831_carb_ab900-determination.pdf. Accessed August 2023.

Ritten. 2023. Renon Cable Car. Available at: https://www.ritten.com/en/1202-railway. Accessed August 2023.

Roosevelt Island Operating Corporation. 2023. Tram History. Available at: https://rioc.ny.gov/168/Tram-History#:~:text=The%20original%20Roosevelt%20Island%20aerial,was%20opened%20in%20May%201976. Accessed June 2023.

Rossi, F. and Nicolini, A. 2011. Noise Prediction Models for Gondola Ropeway Components. Noise Control Engineering Journal, pp 415-431. Available at: https://www.researchgate.net/publication/257941072_Noise_prediction_models_for_gondola_ropeway_components. Accessed August 2023.

Santorini View. 2023. Santorini Cable Car. Available at: https://www.santorini-view.com/attractions/santorini-cable-car/#:~:text=Its%20construction%20started%20in%20the,prosperity%20and%20development%20of%20tourism. Accessed June 2023.

SCJ Alliance Consulting Services. 2022. Gondola Operating Scenarios and Power.

SCJ Alliance Consulting Services. 2023. Photograph of Funivia del Renon.

Seilbahnen International. 2022. The French City Toulouse Now has an Urban 3S Cable Car. Available at: https://www.simagazin.com/en/si-urban-en/the-french-city-toulouse-now-has-an-urban-3s-cable-car/. Accessed August 2023.

Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

Shahan, C. 2014. The World's Longest Aerial Cable Car System. Available at: https://cleantechnica.com/2014/10/05/the-worlds-longest-aerial-cable-car-system-bolivias-mi-teleferico/. Accessed September 2023.

Sharp, Steven. 2018. Homeboy Industries Plans Expansion of its DTLA Headquarters. Available at: https://la.urbanize.city/post/homeboy-industries-plans-expansion-its-dtla-headquarters. Accessed September 2023.

Sharp, Steven. 2021. "Restorative Justice Village" Could Bring More Supportive Housing to Chinatown. Available at: https://la.urbanize.city/post/restorative-justice-village-could-bring-more-supportive-housing-chinatown. Accessed September 2023.

Sharp, Steven. 2021. Homeboy Industries Expands into Affordable Housing. Available at: https://la.urbanize.city/post/homeboy-industries-expands-affordable-housing. Accessed September 2023.

Sierra Club v. County of Fresno (2018) 6 Cal.5th 502.

South Coast Air Quality Management District (SCAQMD). 2008. Draft Guidance Document – Interim CEQA GHG Significance Threshold. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2. Accessed August 2023.

South Coast Air Quality Management District (SCAQMD). 2016. Air Quality Management Plan. Available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf. Accessed: August 2023.

South Coast Air Quality Management District (SCAQMD). 2021. Quemetco Capacity Upgrade Project. Available at: https://files.ceqanet.opr.ca.gov/8174-2/attachment/7bvblgECW7xJV9wgG2iJtxOnqiCHDXVYZLElXRtEw6yx_ZV_m7nE0LafkaH0CyHRtX_pxrIrz99FgzFP0. Accessed August 2023.

South Coast Air Quality Management District (SCAQMD). 2022. Air Quality Management Plan. Available at http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16. Accessed: August 2023.

South Coast Air Quality Management District (SCAQMD). 2023. Air Quality Modeling. Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling. Accessed: August 2023.

Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

State of California Department of Justice Office of the Attorney General (OAG). Environmental Justice. Available at: https://oag.ca.gov/environment/justice. Accessed September 2023.

State of California. 2013. Senate Bill 743. Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743. Accessed August 2023.

State of California and City of Los Angeles. 1988. Quitclaim Deed for El Pueblo de Los Angeles Historic Monument.

Techxplore. 2021. Commuters Escape Mexico City Gridlock in New Cable Car. Available at: https://techxplore.com/news/2021-07-commuters-mexico-city-gridlock-cable.html. Accessed September 2023.

Telluride Mountain Village. 2023. The Gondola. Available at: https://www.telluride.com/discover/the-gondola/. Accessed June 2023.

The California Endowment v. Los Angeles County Metropolitan Transportation Authority. Case No. 22STCP01030 (Los Angeles Superior Court, 2023)

The California Endowment. 2010. Building Healthy Communities Initiative. Available at: https://www.buildinghealthycommunities.org/. Accessed August 2023.

The California Endowment. 2023. Building Healthy Communities: A Decade in Review. Available at: https://www.calendow.org/learning/executive-summary. Accessed August 2023.

The California Endowment. 2023. Annual Report 2023. Available at: https://www.calendow.org/annual-report/. Accessed September 2023.

The Gondola Project. 2016. Mexicable Murals: Mexico's First Urban Cable Car. Available at: https://www.gondolaproject.com/2016/08/31/mexicable-murals-mexicos-first-urban-cable-car/. Accessed August 2023.

The Gondola Project. 2018. Colombian Capital Opens First Urban Gondola. Available at: https://www.gondolaproject.com/category/installations/transmicable/. Accessed September 2023.

The Gondola Project. 2021. Cablebus 2 Gondola Lift in Mexico City Officially Opens. Available at: https://www.gondolaproject.com/2021/08/17/cablebus-2-gondola-lift-in-mexico-city-officially-opens/. Accessed August 2023.

The New York Times (NYTimes). 2016. Near Mexico City, Cable Car Lets Commuters Glide Over Traffic. Available at: https://www.nytimes.com/2016/12/28/world/americas/mexico-city-mexicable.html. Accessed September 2023.

The New York Times (NYTimes). 2021. Frida Kahlo, Aztec Gods: Can Art Lift Up a Poor Neighborhood? Available at: https://www.nytimes.com/2021/10/14/world/americas/mexico-city-iztapalapa-murals.html. Accessed August 2023.

The White House. 2023. Executive Order on Revitalizing Our Nation's Commitment to Environmental Justice for All. Available at: https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all//. Accessed September 2023.

Translink. 2020. Burnaby Mountain Gondola. Available at: https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola. Accessed: September 2023.

Translink. 2021. Burnaby Mountain Gondola: Route Selection Report. Available at: https://www.translink.ca/-/media/translink/documents/plans-and-projects/rapid-transit/burnaby-mountain-gondola/route-selection-report/route-selection-report.pdf#view=fitH. Accessed August 2023.

Trenscat. 2023. E Teleferic de Montjuic. Available at: http://www.trenscat.com/tmb/telefericmontjuic_ct.html. Accessed August 2023.

U.S. v. Houston (2016) 813 F.3d 282, 285.

UCLA Mobility Lab. 2022. Mobility Analytics and Decision Sciences LA Sim: Dynamic Mesoscopic Network Modeling of LA. Available at: https://mobility-lab.seas.ucla.edu/research/modeling-and-control-of-dynamic-complex-systems-in-smart-cities/. Accessed August 2023.

UCLA Mobility Lab. 2022. Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions. Available at: https://www.stopthegondola.org/ucla-study. Accessed August 2023.

UCLA Mobility Lab. 2023. Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection. Available at: https://mobility-lab.seas.ucla.edu/. Accessed September 2023.

UCLA Mobility Lab. 2023. Tweet on January 13, 2023. https://twitter.com/ucla_its/status/1613998706851971075?s=46&t=p_Kv02sYuM0ssXk0RDXWeA. Accessed September 2023.

UCLA Mobility Lab. Multiple. Publications. Available at: https://mobility-lab.seas.ucla.edu/publications/. Accessed August 2023.

United States Code. Title 49 - Transportation.

United States Code. Title 23, Section 138.

United States Code. Title 49, Section 5302.

United States Code. Title 49, Section 303.

United States Code. Title 54, Section 306108.

United States Code. National Historic Preservation Act, Section 106.

United States Environmental Protection Agency (USEPA/EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C70thru75%5CTxt%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.

United States Environmental Protection Agency (USEPA/EPA). 1981. Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/9100OOAJ.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C81thru85%5CTxt%5C00000018%5C9100OOAJ.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed August 2023.

United States Green Building Council (USGBC). 2023. LEED for Building Design and Construction. Available at: https://www.usgbc.org/leed/rating-systems/new-buildings#:~:text=LEED%20for%20Building%20Design%20and%20Construction%20(LEED%20BD%2BC),sustainability%20feature%2C%20maximizing%20the%20benefits. Accessed August 2023.

Utah Department of Transportation (UDOT). 2022. Little Cottonwood Canyon EIS: Executive Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2022/08/LCC_FEIS_00b_Summary.pdf. Accessed September 2023.

Utah Department of Transportation (UDOT). 2023. Little Cottonwood Canyon Environmental Impact Statement. Available at: https://littlecottonwoodeis.udot.utah.gov/. Accessed September 2023.

Utah Department of Transportation (UDOT).2022. Little Cottonwood Canyon EIS. Project Overview and Final EIS Alternative Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/final-eis/. Accessed September 2023.

WBUR. 2017. An Aerial Tram Is One Mexican City's Solution To Traffic And Crime. Available at: https://www.wbur.org/hereandnow/2017/04/26/mexico-ecatepec-aerial-tram. Accessed September 2023.

Zacatecas. 2021. Zacatecas Cable Car. Available at: https://www.zacatecastravel.com/teleferico. Accessed June 2023.